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December 8, 2007

To Responsible Agencies, Trustee Agencies, and Interested Parties:

RE: CASE NO. 2007.0030E – 8 WASHINGTON STREET/SEAWALL LOT 351 PROJECT

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

The San Francisco Planning Department and San Francisco Redevelopment Agency have issued a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the above-referenced project, described below. An Initial Study has also been prepared to provide more detailed information regarding the proposed project and the environmental issues to be considered in the EIR. The NOP/Initial Study is either attached or is available at the Planning Department website
uest from **Nannie Turrell,** whom you may reach at **(415) 575-**

project site is located on the north side of Washington Street
umm Street. The proposed project includes the temporary
teway Tennis & Swim Club facility from the project site and
primarily residential buildings and new outdoor health club
located on the southern part of the project site, would have
e feet (gsf) and would be eight stories (84 feet) tall. The
tely 170 residential units, approximately 20,100 gsf of retail
approximately 12,000 gsf, and up to 520 underground parking
. The proposed private outdoor health club facilities would
wimming pools; a proposed open space corridor north of the
ic.

development Agency have determined that an EIR must be
prior to any final decision regarding whether to approve the
to provide information about potential physical environmental
identify ways to minimize significant effects, and to describe
osed project. Preparation of an NOP or EIR does not indicate
or to disapprove the project. However, prior to making any
consider the information contained in the EIR.

f the EIR are welcomed. Written comments will be accepted until the close of business, **January 10, 2008** and should be sent to William Wycko, Acting Environmental Review Officer, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for an agency that is a Responsible or a Trustee Agency, we need to know the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. We will also need the name of the contact person for your agency. If you have questions concerning environmental review of the proposed project, please contact **Nannie Turrell** at **(415) 575-9047.**

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Project Description: The 3.2-acre project site is located on the north side of Washington Street between The Embarcadero and Drumm Street. The proposed project includes the temporary removal of the existing Golden Gateway Tennis & Swim Club facility from the project site and development of the site with two primarily residential buildings and new outdoor health club facilities. The proposed buildings, located on the southern part of the project site, would have approximately 614,000 gross square feet (gsf) and would be eight stories (84 feet) tall. The buildings would contain approximately 170 residential units, approximately 20,100 gsf of retail and restaurant uses, a health club of approximately 12,000 gsf, and up to 520 underground parking spaces for residents and the public. The proposed private outdoor health club facilities would include six tennis courts and two swimming pools; a proposed open space corridor north of the buildings would be open to the public.

The Planning Department and Redevelopment Agency have determined that an EIR must be prepared for the proposed project prior to any final decision regarding whether to approve the project. The purpose of the EIR is to provide information about potential physical environmental effects of the proposed project, to identify ways to minimize significant effects, and to describe and analyze alternatives to the proposed project. Preparation of an NOP or EIR does not indicate a decision by the City to approve or to disapprove the project. However, prior to making any decision, the decision makers must consider the information contained in the EIR.

Comments concerning the scope of the EIR are welcomed. Written comments will be accepted until the close of business, **January 10, 2008** and should be sent to William Wycko, Acting Environmental Review Officer, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

If you work for an agency that is a Responsible or a Trustee Agency, we need to know the views of your agency as to the scope and content of the environmental information that is relevant to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. We will also need the name of the contact person for your agency. If you have questions concerning environmental review of the proposed project, please contact **Nannie Turrell** at **(415) 575-9047**.

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NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date of this Notice: December 8, 2007

Lead Agency: San Francisco Planning Department
1650 Mission Street, 4th Floor, San Francisco, CA 94103
Agency Contact Person: Nannie Turrell **Telephone:** (415) 575-9047

Project Title: 2007.0030E– 8 Washington Street/Seawall Lot 351 Project
Project Sponsor: San Francisco Waterfront Partners II
Contact Person: Simon Snellgrove **Telephone:** (415) 675-2100

Project Address: 8 Washington Street and Seawall Lot 351 (north of Washington, between The Embarcadero and Drumm Street)
Assessor's Block and Lot: Assessor's Block 168/Lot 58, Block 171/Lot 69, Block 201/Lot 12, and Block 201/Lot 13
City and County: San Francisco

Project Description: The proposed project includes the temporary removal of the existing Golden Gateway Tennis & Swim Club facility from the project site and development of the site with two primarily residential buildings and new outdoor health club facilities. The proposed buildings, located on the southern part of the project site, would have approximately 614,000 gross square feet (gsf) and would be eight stories (84 feet) tall. The buildings would contain approximately 170 residential units, approximately 20,100 gsf of retail and restaurant uses, a health club of approximately 12,000 gsf, and up to 520 underground parking spaces for residents and the public. The proposed private outdoor health club facilities would include six tennis courts and two swimming pools; a proposed open space corridor north of the buildings would be open to the public.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT. AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance).

WRITTEN COMMENTS on the scope of the EIR will be accepted until the close of business on **January 10, 2008.** Written comments should be sent to William Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

Documents relating to the proposed project are available for review, by appointment, at the Planning Department's Major Environmental Analysis office, 1650 Mission Street, Suite 400. Please call Nannie Turrell at (415) 575-9047.

State Agencies: We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

December 4, 2007
Date

William Wycko, Acting Environmental Review Officer
San Francisco Planning Department

December 4, 2007
Date

Stanley Muraoka, Environmental Review Officer
San Francisco Redevelopment Agency

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INITIAL STUDY
8 WASHINGTON STREET/SEAWALL LOT 351
Case No. 2007.0030E

A. PROJECT DESCRIPTION

Introduction

An environmental evaluation application (2002.0376E) was filed on behalf of Golden Gateway Center on April 10, 2002 for a project at 8 Washington Street, between Drumm Street and The Embarcadero. The Golden Gateway Center project site was on three parcels: Assessor's Block 201/Lot 12, Block 171/Lot 69, and Block 168/Lot 58. The project would have entailed the removal of the existing Golden Gateway Tennis & Swim Club facility, including nine tennis courts, two pools, and three structures, and construction of an eight-story building of about 283,612 gross square feet (gsf) entirely on Assessor's Block 201/Lot 12. Six new tennis courts would have been constructed on the northern portion of the Golden Gateway Center project site (Assessor's Block 168/Lot 58 and Block 171/Lot 69). The new building would have contained approximately 120 residential units, a new health club facility with two swimming pools, and about 170 parking spaces. The existing health club facility, currently located across Drumm Street, would have moved into the lower two levels of the proposed building.

A Preliminary Mitigated Negative Declaration (PMND) analyzing the potential environmental effects of the project was published on November 1, 2003. On November 21, 2003, Ms. Sue Hestor filed an appeal of the PMND on behalf of the Friends of Golden Gateway (FOGG). The appeal letter contended that the project site was part of an existing Planned Unit Development approved by the Planning Department in 1961 and 1962. Issues raised in the appeal letter included concerns that the PMND failed to adequately analyze: 1) the project's compatibility with existing zoning and plans; 2) population and housing effects, in particular the provision of affordable housing; 3) the cumulative transportation-related effects of existing and proposed development in the project area; and 4) the impact of shadow cast by the project on property along The Embarcadero.

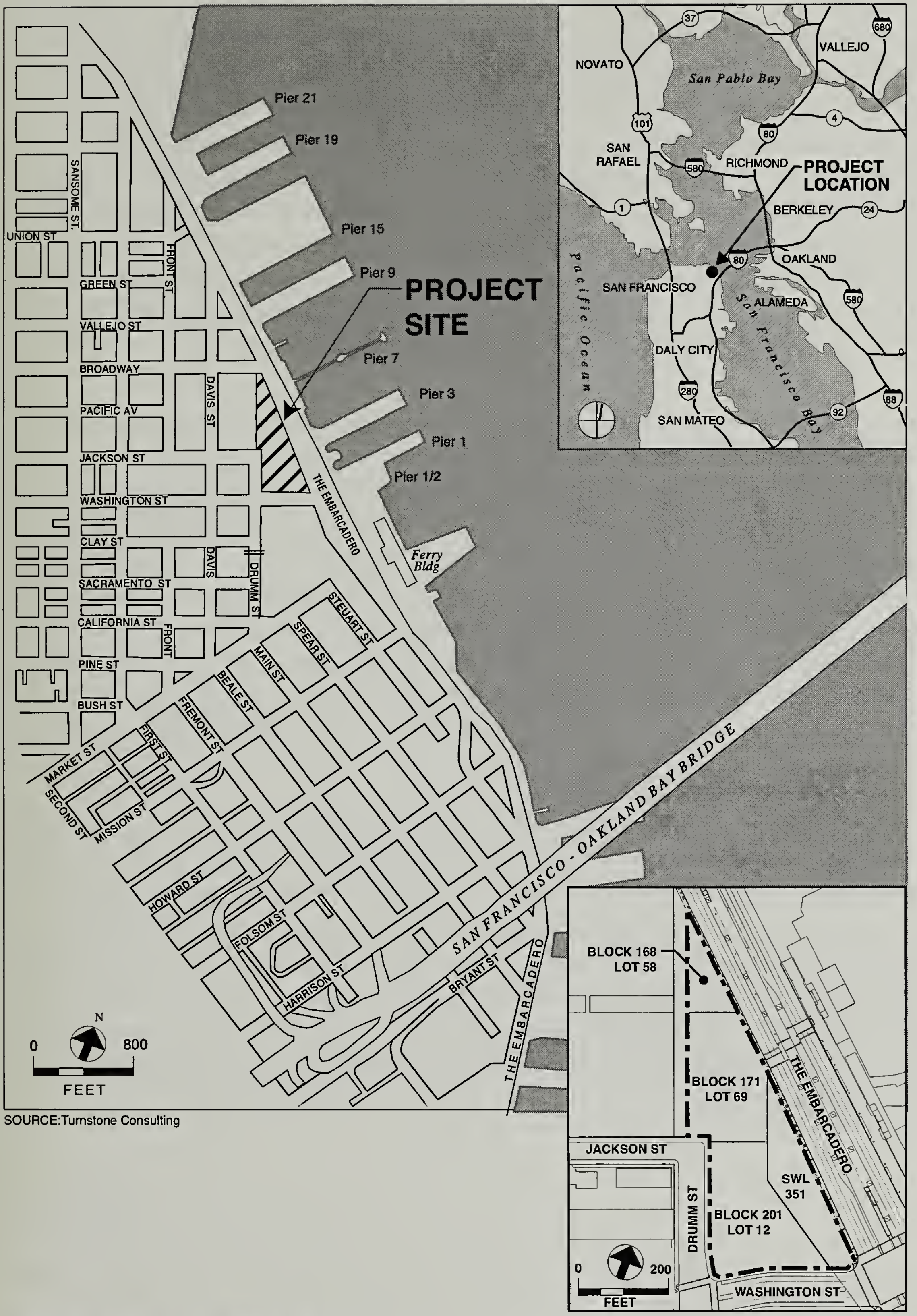
At its hearing on February 5, 2004, the San Francisco Planning Commission upheld the PMND and approved Conditional Use and Planned Unit Development authorizations for the project. FOGG appealed the Planning Commission's decisions to the San Francisco Board of Supervisors. On April 13, 2004, the Board of Supervisors adopted a motion disapproving the Planning Commission's decision to issue the Negative Declaration because it did not contain information about the relationship of the proposed project to the *Embarcadero-Lower Market (Golden Gateway) Redevelopment Plan* and Redevelopment Area. (The Board of Supervisors tabled the motions regarding the appeal of the Conditional Use authorization.)

In a separate set of actions, on May 15, 2003, Mr. David Burnett (on behalf of FOGG) requested a written determination from the San Francisco Zoning Administrator that the Planned Unit Development application for the project could not be reviewed on its own, and contended that the project approvals could only be processed as a Planned Unit Development covering all of the Embarcadero-Lower Market (Golden Gateway) Redevelopment Project Area (of which the project site was a part). On October 22, 2003, the Acting Zoning Administrator ruled that the project application could be filed and reviewed as a stand-alone project. Mr. Burnett subsequently appealed that determination to the Board of Appeals. On January 14, 2004, the San Francisco Board of Appeals upheld the Acting Zoning Administrator's determination.

Since that time, a new environmental evaluation application (EE application) has been filed by San Francisco Waterfront Partners II (the "project sponsor") on behalf of the Golden Gateway Center for a project on the original 8 Washington project site and the adjacent Seawall Lot 351, which is owned by the Port of San Francisco (Port) and within the Port's jurisdiction. The Port has not offered Seawall Lot 351 for development and is not a co-sponsor of the proposed project, but has authorized San Francisco Waterfront Partners II to submit an EE application that includes Seawall Lot 351 because the project would be consistent with the *Port of San Francisco Waterfront Land Use Plan* governing development on lands within its jurisdiction. The *Waterfront Land Use Plan* establishes the following development standard: "Explore the possibility of obtaining economic value from Seawall Lot 351 by combining it with the adjacent Golden Gateway residential site to provide expanded opportunities for mixed residential and commercial development." This project is presented and described in detail below.

Project Site Conditions

The project site is located in downtown San Francisco, on the north side of Washington Street between The Embarcadero and Drumm Street. The overall shape of the project site is roughly a right triangle, bounded by The Embarcadero to the east, Washington Street to the south, and Drumm Street and a walkway and public utilities easement to the west. (See Figure 1: Project Location.) The project site encompasses Assessor's Block 168/Lot 58, Block 171/Lot 69, and Block 201/Lot 12, owned by the Golden Gateway Center; and Seawall Lot 351, which includes Block 201/Lot 13 and is owned by the Port.



SOURCE:Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 1: PROJECT LOCATION

The lots owned by the Golden Gateway Center are occupied by the Golden Gateway Tennis & Swim Club (operated by Western Athletic Clubs); Seawall Lot 351 is occupied by a surface parking lot. The private athletic club has nine tennis courts, two swimming pools, and three buildings on the project site.[1] The one- to one-and-one-half story buildings contain uses supporting the club with approximately 3,960 gsf. The club also has a 17-space private parking lot. The parking lot on Seawall Lot 351 has 110 spaces. Except for 10 spaces reserved for use by the Port of San Francisco, the entire Seawall Lot 351 is controlled by the ground lessee of the Ferry Building pursuant to a Parking Agreement with the Port, and must be used to serve visitors to the Ferry Building. The Ferry Building ground lessee operates the lot as a public pay lot through Ace Parking Management.

The northern part of the project site (north of Jackson Street) is comprised of two parcels. The northernmost parcel, Assessor's Block 168/Lot 58, is a triangular lot covering about 12,638 square feet (sq. ft.), with one tennis court. The southernmost parcel, Assessor's Block 171/Lot 69, is a roughly rectangular lot covering about 47,681 sq. ft., with three tennis courts, a basketball court, two outdoor swimming pools, a lawn, and two buildings. One building is a 460-gsf, one-story "tennis shack" and the other is a 1,400-gsf, one-story building with dressing rooms. The southern part of the site is also comprised of two parcels. Assessor's Block 201/ Lot 12 is a roughly rectangular lot covering about 50,425 sq. ft., with five tennis courts, the private parking lot (6,000 sq. ft.) serving the athletic club, and a 2,100-gsf pro shop. Seawall Lot 351 covers about 27,937 sq. ft. (See Figure 2: Existing Uses on the Project Site.) Overall, the project site encompasses approximately 138,681 sq. ft. (3.2 acres).

The lots owned by the Golden Gateway Center are in a Residential/Commercial Combined: High Density (RC-4) zoning district and an 84-E height and bulk district. These lots are also within the Golden Gateway Redevelopment Project Area. The *Embarcadero-Lower Market (Golden Gateway) Redevelopment Plan* (as amended through November 20, 1995, the "*Redevelopment Plan*") Section 1301 states that "[t]he Plan shall be effective until January 1, 2009." Section 1301 explicitly provides that the land use controls of the Plan do not apply to Block 201. The land use controls affecting the *Redevelopment Plan* area are set forth in Article VIII of the *Redevelopment Plan*. These land use controls are in addition to any applicable zoning or building ordinances, codes, rules or regulations.

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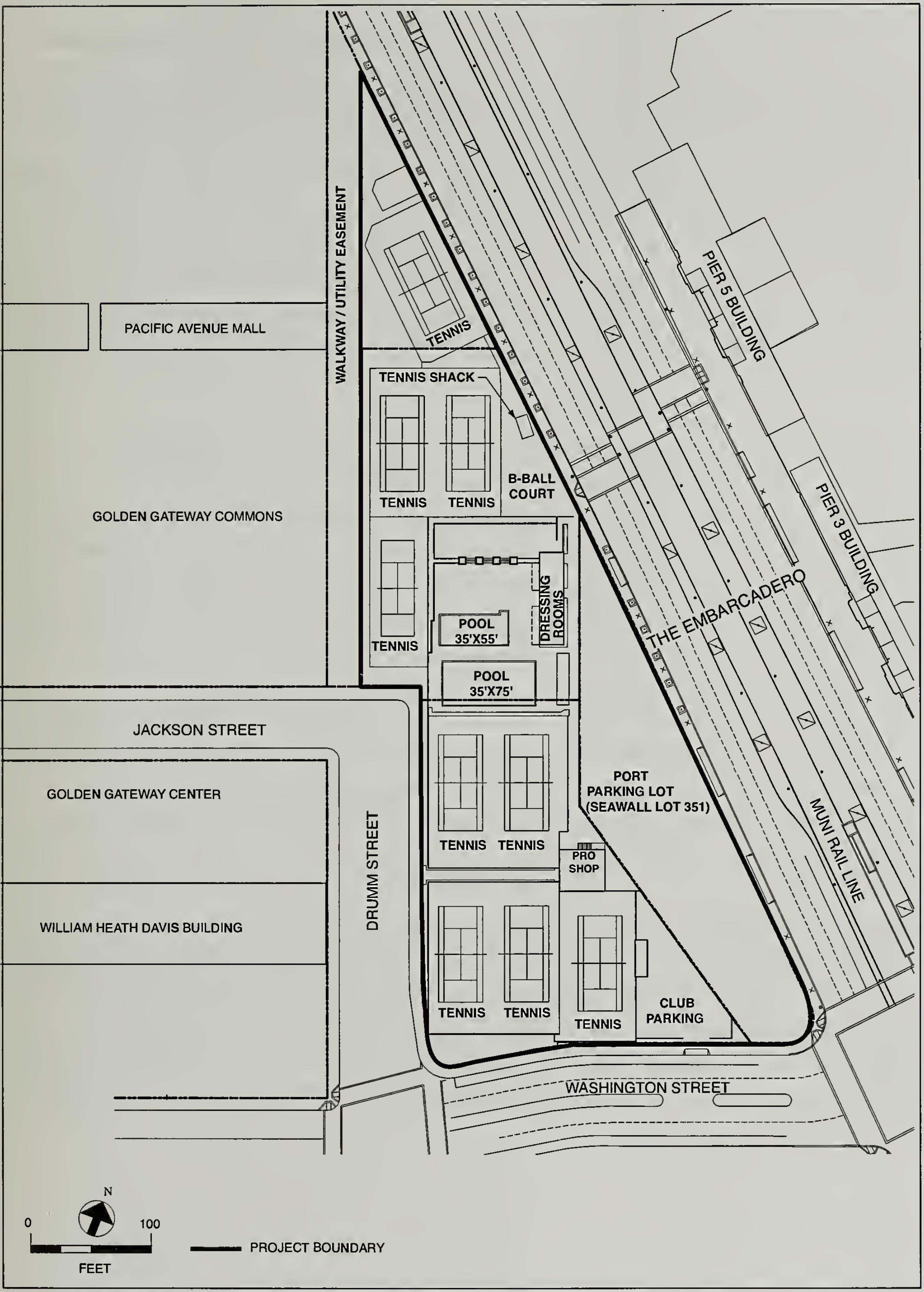
[1] The Golden Gateway Tennis & Swim Club also has a 7,355-gsf health club facility, located across Drumm Street in Golden Gateway Center.



SOURCE: Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 2: EXISTING USES ON THE PROJECT SITE

Section 802 of the *Redevelopment Plan* provides that the requirements and restrictions specified in Article VIII of the *Redevelopment Plan* "shall be in force and effect for a period of thirty (30) years from the transfer of title to the redeveloper and shall be incorporated in all deeds, contracts and other instruments of land disposition, leases and such other contracts and instruments as appropriate as covenants running with the land for said period of thirty (30) years." The deed for Parcel R-II(a) Two (Block 201, Lot 12) was recorded on August 16, 1964. The *Redevelopment Plan* remains in effect for Block 171 through May 19, 2008 and through January 1, 2009 for Block 168. As a matter of general law, the *Redevelopment Plan* controls to the extent that it is inconsistent with applicable City planning laws. Once the *Redevelopment Plan* is no longer in effect, only the requirements of the San Francisco *Planning Code* will be applicable to govern land use on those parcels.

Under the *Redevelopment Plan*, the permitted use for Blocks 168 and 171 is multi-family residential use and such community facilities as may be approved by the Agency, and neighborhood shopping facilities, general commercial and office uses below the lowest story intended for dwelling purposes. Under the *Planning Code*, the applicable RC-4 zoning permits high-density residential and supporting commercial uses. The proposed project allows for continued use of Blocks 168 and 171 for the Golden Gateway Tennis & Swim Club, which would be consistent with both the *Redevelopment Plan* and the *Planning Code* land use controls.

Seawall Lot 351 is in a Public (P) zoning district and an 84-E height and bulk district. Seawall Lot 351 is part of the Ferry Building Mixed Use Opportunity Area of the *Port of San Francisco Waterfront Land Use Plan*, which identifies the following acceptable land uses for Seawall Lot 351: open space, residential, assembly and entertainment, general office, parking, retail (including restaurant), recreational enterprises, visitor services and community facilities. Seawall Lot 351 is also subject to the common law public trust doctrine, as well as the terms and conditions of the Burton Act, which is the trust grant from the State to the City (sometimes referred to collectively as the "public trust"). The proposed residential use is not consistent with the public trust. Therefore, the project sponsor would be required to obtain State Lands Commission (State Lands) approval to exchange a portion of Seawall Lot 351 for non-trust property pursuant to an exchange agreement authorized by State Lands, or to obtain authority by the California State Legislature to lift the public trust restrictions prohibiting housing on public trust lands from Seawall Lot 351.

Project Overview

The proposed project includes the temporary removal of the existing Golden Gateway Tennis & Swim Club facility from the project site and development of the site with two primarily residential buildings and new outdoor health club facilities. (See Figure 3: Proposed Site Plan.) The proposed buildings would be built to Leadership in Energy and Environmental Design (LEED) standards.[2] The proposed buildings, located on the southern part of the project site, would have approximately 614,000 gsf and would be eight stories (84 feet) tall.[3] The buildings would contain approximately 170 residential units and up to 520 underground parking spaces for residents and the public. The proposed building space is shown below.

Type of Use	Area (GSF)
Residential	286,400
Residential Parking	82,000
Public Parking	155,600
Retail/Office	9,600
Restaurant/Bar	10,500
Health Club	12,000
Common Areas	19,100
Service and Core Space	38,800
Total	614,000

The Golden Gateway Tennis & Swim Club would operate the proposed health club in the new buildings (in the area where the buildings are joined on the first floor) as well as tennis courts and other outdoor recreational facilities (totaling about 65,600 sq. ft.) on the northern part of the project site. The project also would include private and common residential open space (about 15,700 sq. ft.)[4] and publicly accessible open space (about 14,400 sq. ft.).

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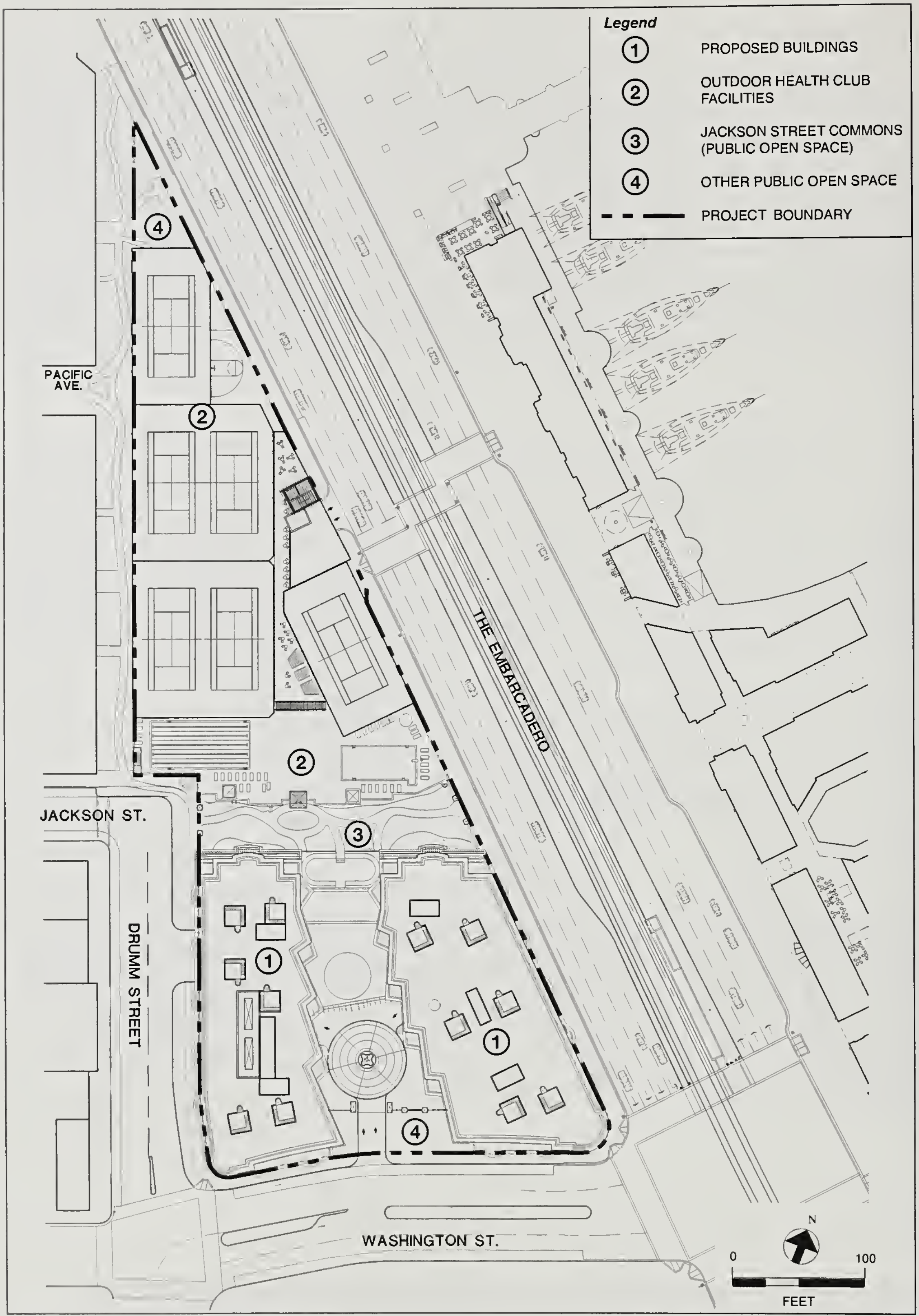
[2] The project sponsor intends to design the proposed project with the goal of obtaining LEED Gold certification; the actual certification level achieved will be determined by the U.S. Green Building Council.

[3] Not including 10-foot-high mechanical penthouse and stair core. These areas are not considered part of the building height, per Planning Code Section 260(b).

[4] Included in the building space totals listed in the tabulation above.



SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 3: PROPOSED SITE PLAN

Proposed Buildings and Parking

The proposed building design has two eight-story towers in a roughly north-south orientation, one along The Embarcadero and the other along Drumm Street. These towers would be connected near their northern ends by a two-story, domed central space, set back from Washington Street, and marking the main entrance to the buildings. The building towers would be built generally along the Drumm Street, Washington Street, and The Embarcadero property lines; the area between the two towers along Washington Street would provide a courtyard (a fenced open space with public access) with outdoor seating in front of the main entrance to the buildings. Building façades would be articulated on all elevations by windows of varying sizes, terraces (some of which would project beyond the property lines), and setbacks. Setbacks would be incorporated into the buildings at the seventh and eighth levels. (For project elevations, see Figure 4: Drumm Street Elevation, Figure 5: Jackson Street Elevation, Figure 6: Embarcadero Elevation, and Figure 7: Washington Street Elevation.)

The first level (ground floor) of the proposed buildings would contain lobby and common areas, fitness facilities (the Golden Gateway Tennis & Swim Club), retail spaces, a restaurant and bar, and a small building management office (or retail space). (See Figure 8: Ground-Floor Plan.) The lobby would be set back from Washington Street and would be accessed from Washington through the courtyard and circular vehicle drop-off area. The lobby also would be accessed through hallways leading from entrances along The Embarcadero and Drumm Street. Elevators on each side of the lobby would provide access to residences on floors two through eight.

The Golden Gateway Tennis & Swim Club would be accessible from an entrance on The Embarcadero and a direct entrance on the north side of the buildings. The retail spaces would occupy the northwest and southwest corners of the buildings (fronting on Drumm Street and the intersection of Drumm and Washington Streets). The retail spaces would range in size from about 1,400 gsf to about 6,400 gsf. In addition to a shop for the health club, the types of uses that might occupy the retail spaces include convenience retail and a coffee shop/newsstand, among others. About 1,500 gsf of space in the southwest part of the buildings could be used for a building management office, café, or retail establishment. The 12,000-gsf health club space would be accessible only to health club members; the retail and restaurant space, garage entrance ramp from Washington Street, and eastern garage elevators (approximately 21,400 gsf) would be accessible to the public; and the main lobby, western garage elevators, and corridors (approximately 17,900 gsf) would be accessible to building residents.[5]

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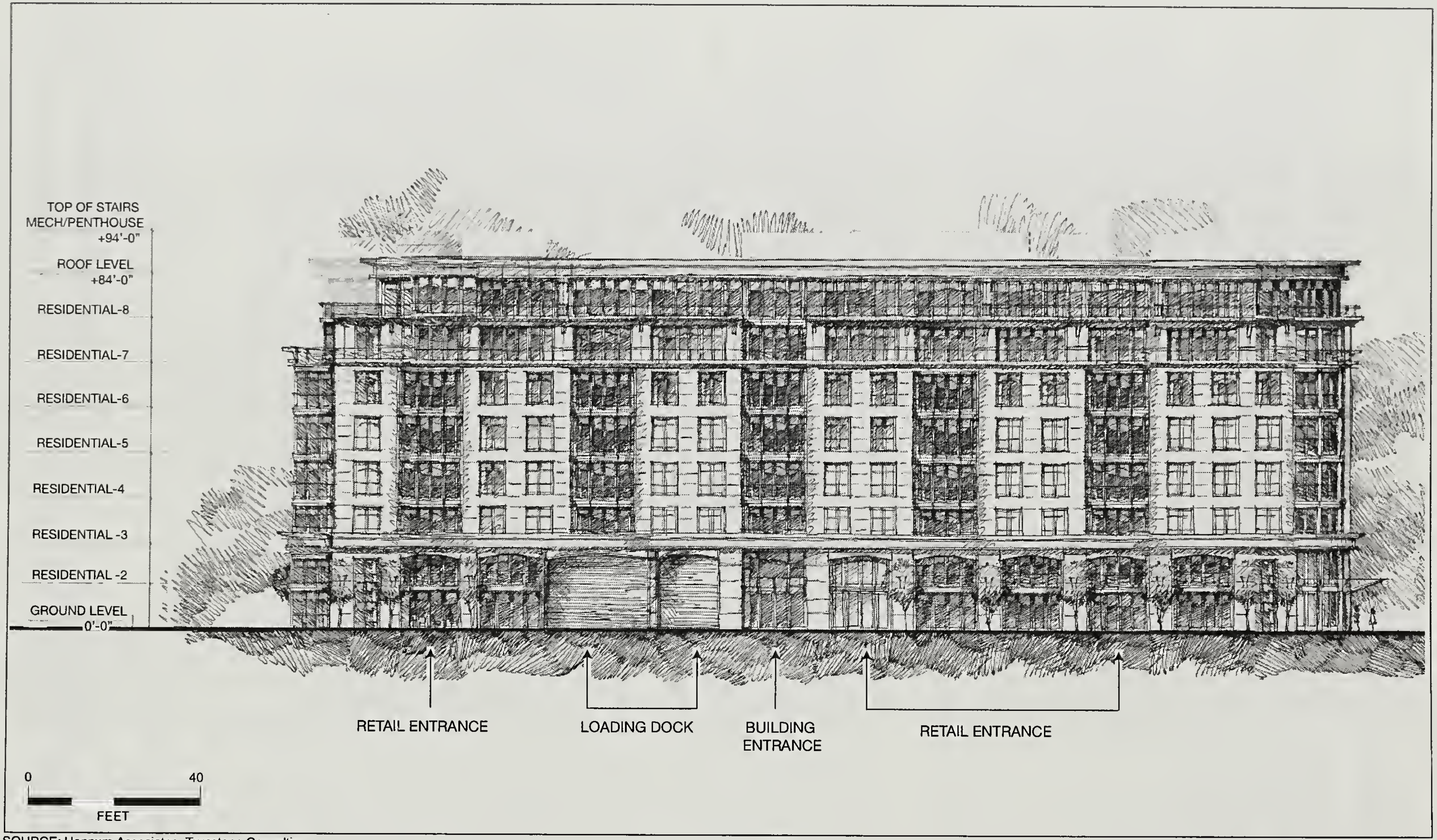
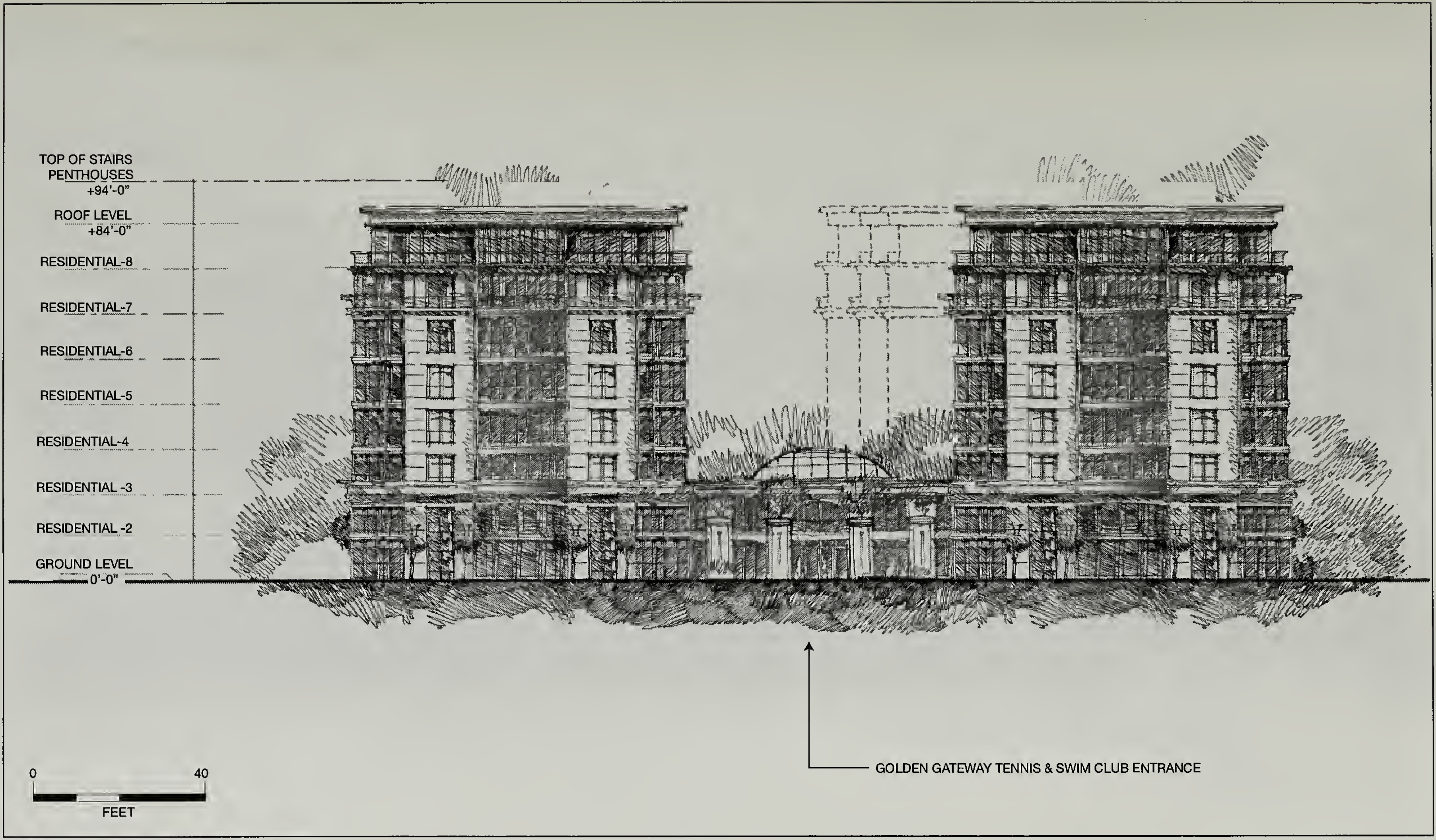
[5] The estimated space accessible to residents also includes the loading dock, trash room, and building stairs.



SOURCE: Hannum Associates, Turnstone Consulting

FIGURE 4: PROPOSED DRUMM STREET ELEVATION

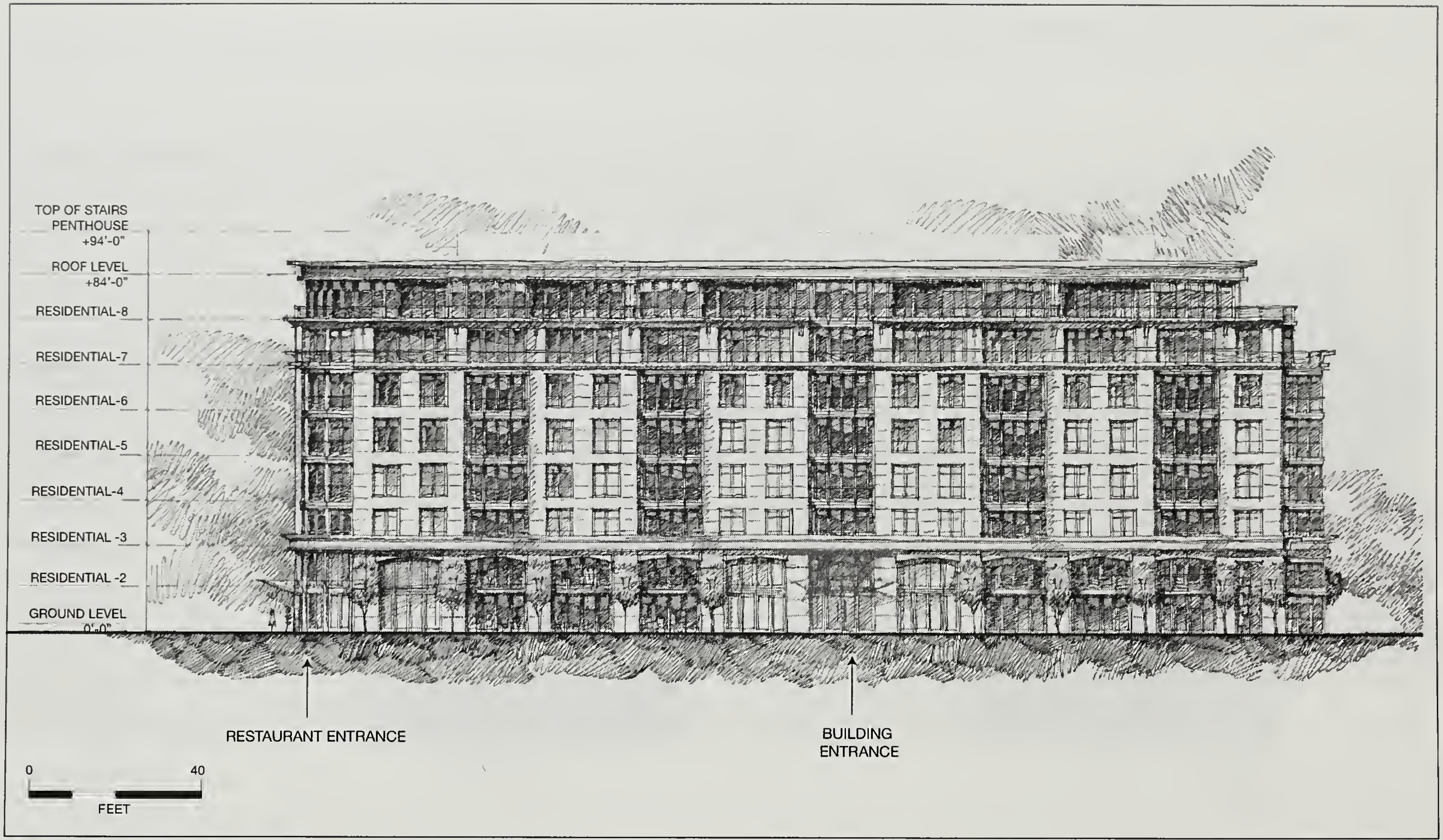


SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 5: PROPOSED JACKSON STREET ELEVATION



SOURCE: Hannum Associates, Turnstone Consulting

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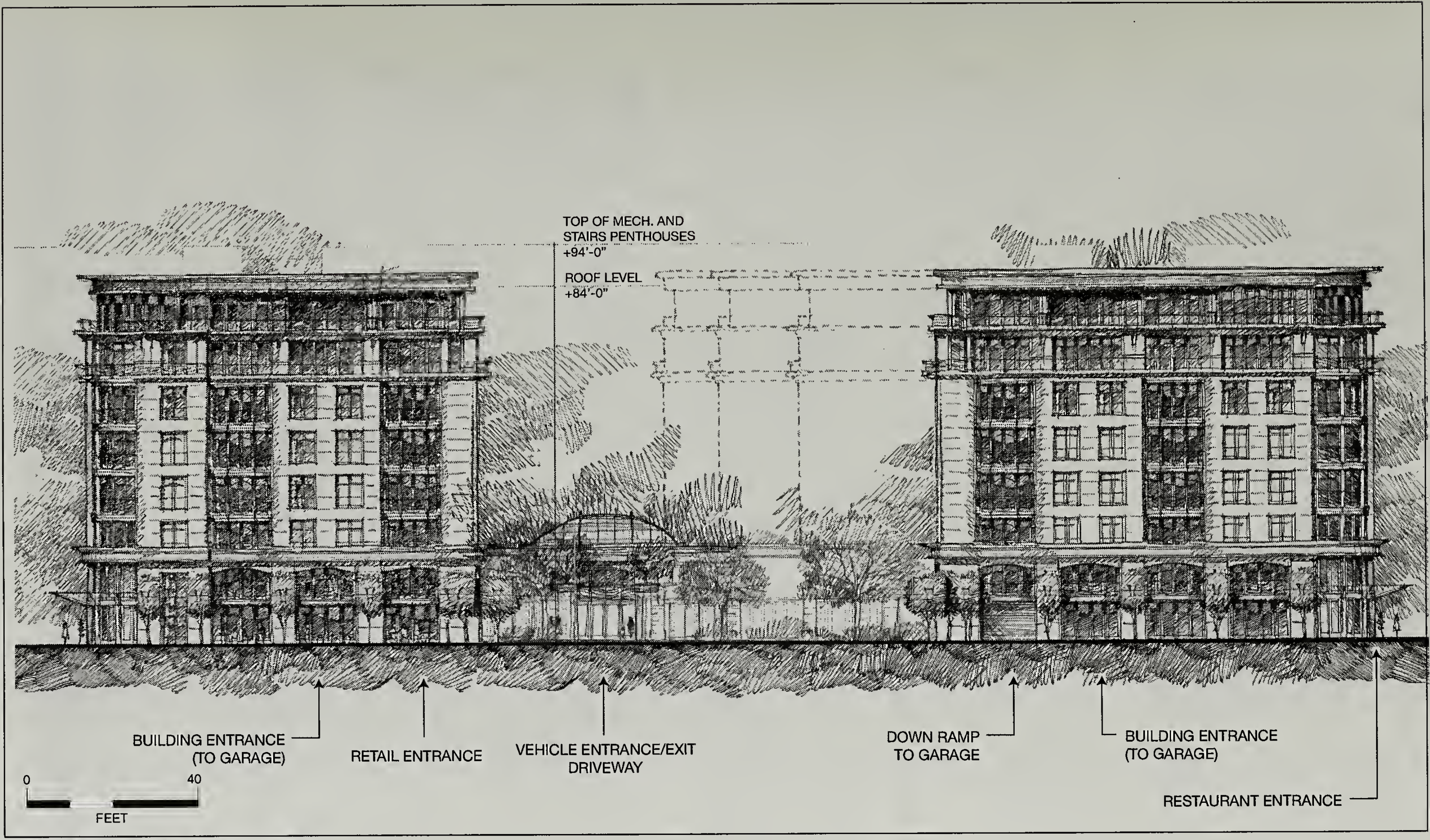
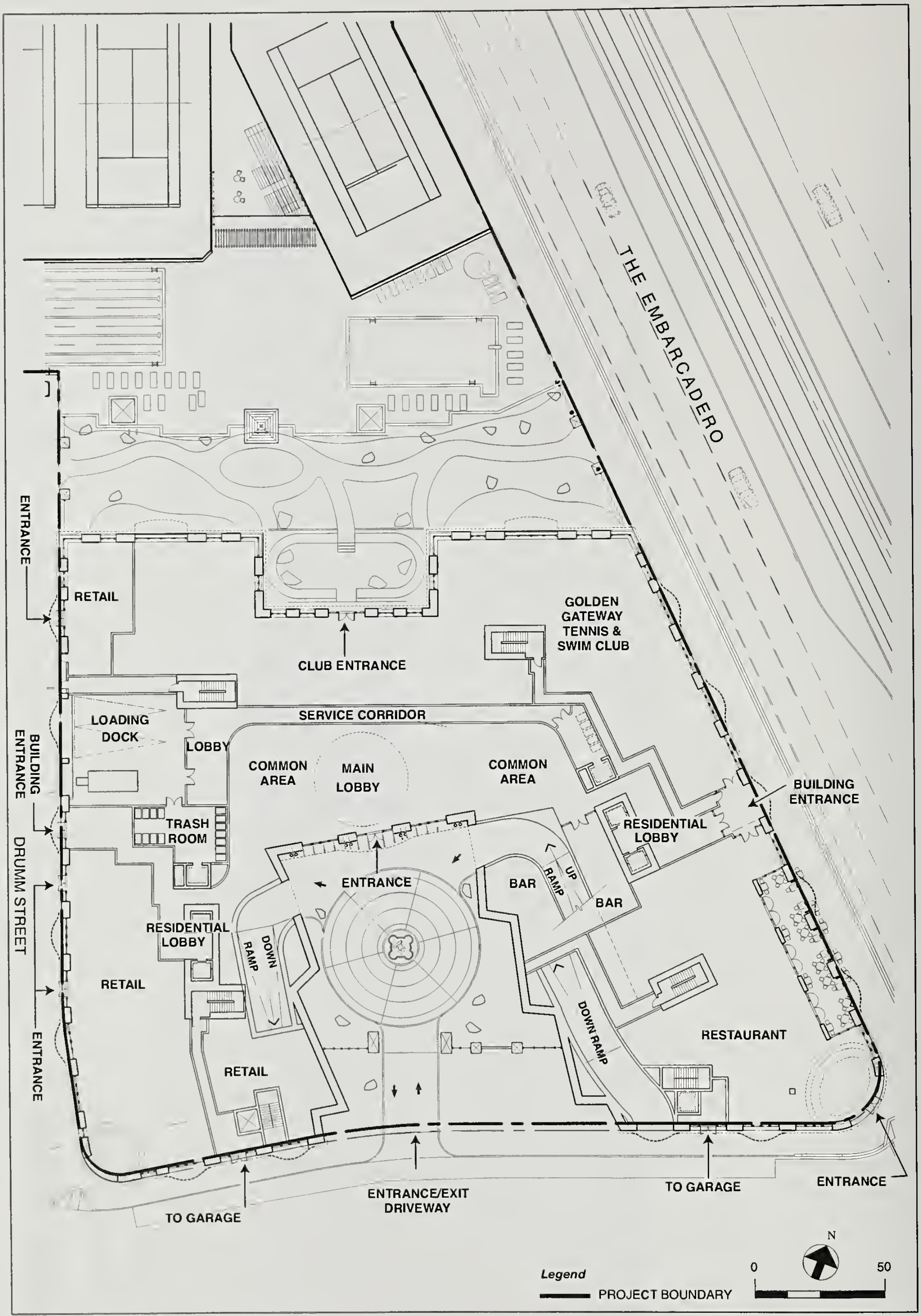
FIGURE 6: PROPOSED EMBARCADERO ELEVATION



SOURCE: Hannum Associates, Turnstone Consulting

FIGURE 7: PROPOSED WASHINGTON STREET ELEVATION



SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 8: PROPOSED GROUND FLOOR PLAN

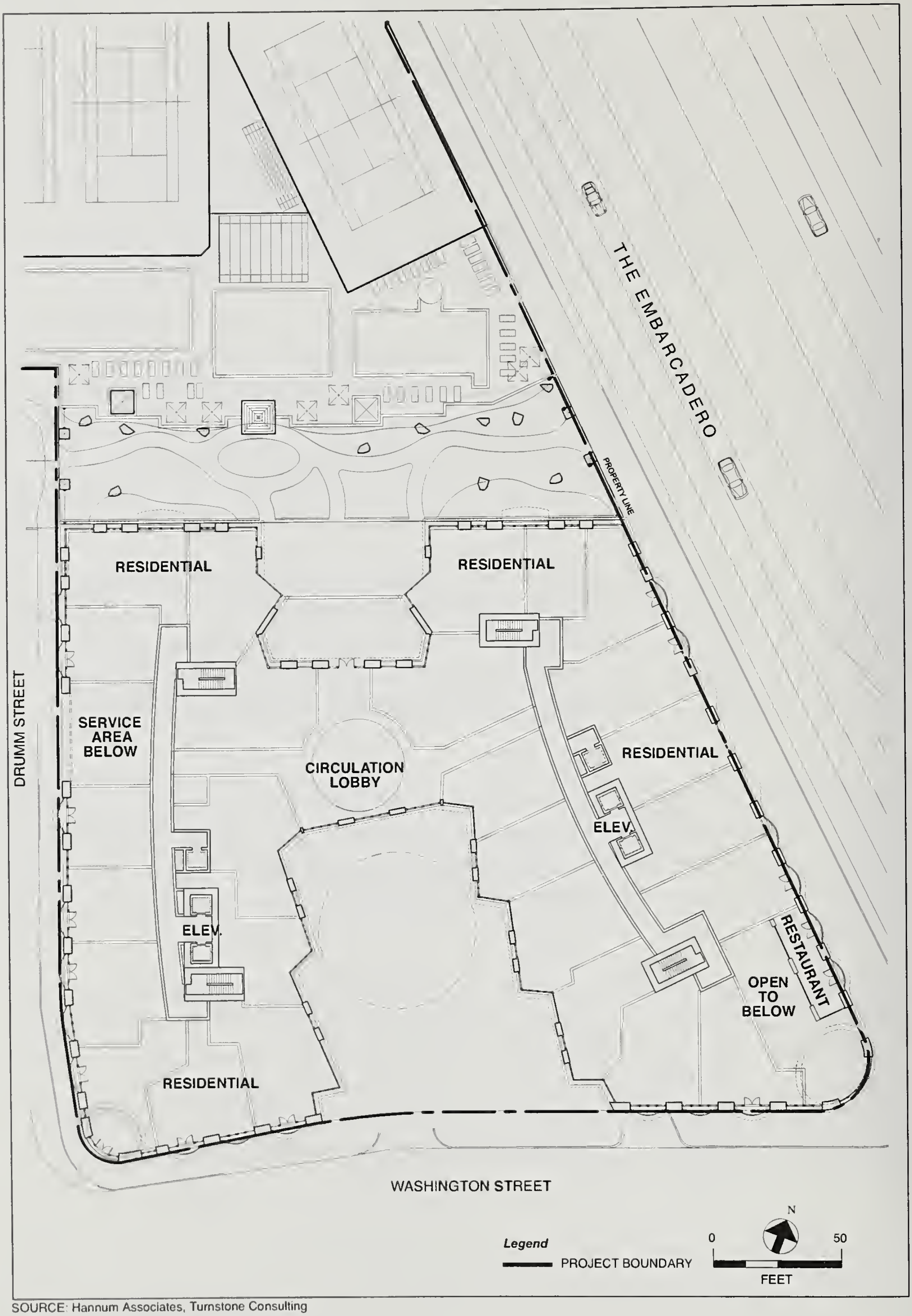
The proposed restaurant would occupy the southeast corner of the buildings and would front on The Embarcadero and the intersection of The Embarcadero and Washington Street, where the main entrance would be located. An outdoor seating area would be provided within a covered patio along The Embarcadero, and additional seating would be provided on a mezzanine level in the building. The restaurant is envisioned to be a brasserie with an estimated maximum of 400 seats. The proposed restaurant would be connected to a bar with an entrance from the outdoor courtyard near the main lobby. The restaurant would contain about 9,300 gsf and the bar about 1,200 gsf.

The ground floor also would contain a service corridor behind the main lobby. Between the two retail spaces on Drumm Street, a trash area and loading dock would serve the buildings. The loading dock would have two spaces and a facility where residential and commercial trash would be held for pick-up. Trucks would access the loading dock through a rolling gate and driveway directly off of Drumm Street. The ground floor also would include space for access to the garage and ramps leading to and from the proposed underground parking (discussed later in this section).

The second floor would contain residences, the mezzanine seating for the restaurant (about 700 gsf), several areas open to the first floor, and lobby and core space. (See Figure 9: Second-Floor Plan.) The third through eighth floors would contain residential units and core space. (See Figure 10: Typical Third to Sixth Floor Plan, Figure 11: Sixth Floor Plan, Figure 12: Seventh Floor Plan, and Figure 13, Eighth Floor Plan.) All of the residences would have two or more bedrooms.

The project sponsor proposes to install a “green roof” to help the project obtain LEED credits for stormwater management and heat island reduction. A green roof is a vegetated surface that captures rainwater and returns part of it back to the atmosphere through evaporation. The sponsor anticipates that the proposed green roof would be an active garden area with raised hardscape paths, accessible to residents of the penthouse.

Parking for residents and the public would be provided on three levels below the proposed buildings (about 197,900 gsf). (See Figure 14: Parking Level A, Figure 15: Parking Level B, and Figure 16: Parking Level C.) The parking beneath the buildings would be connected via a pass-through to one level of below-ground parking to the north, for use by the public (about 39,700 gsf). The lowest level of parking (Level C beneath the buildings) would be about 29 feet below grade. (See Figure 17, East-West Section, and Figure 18: North-South Section.)

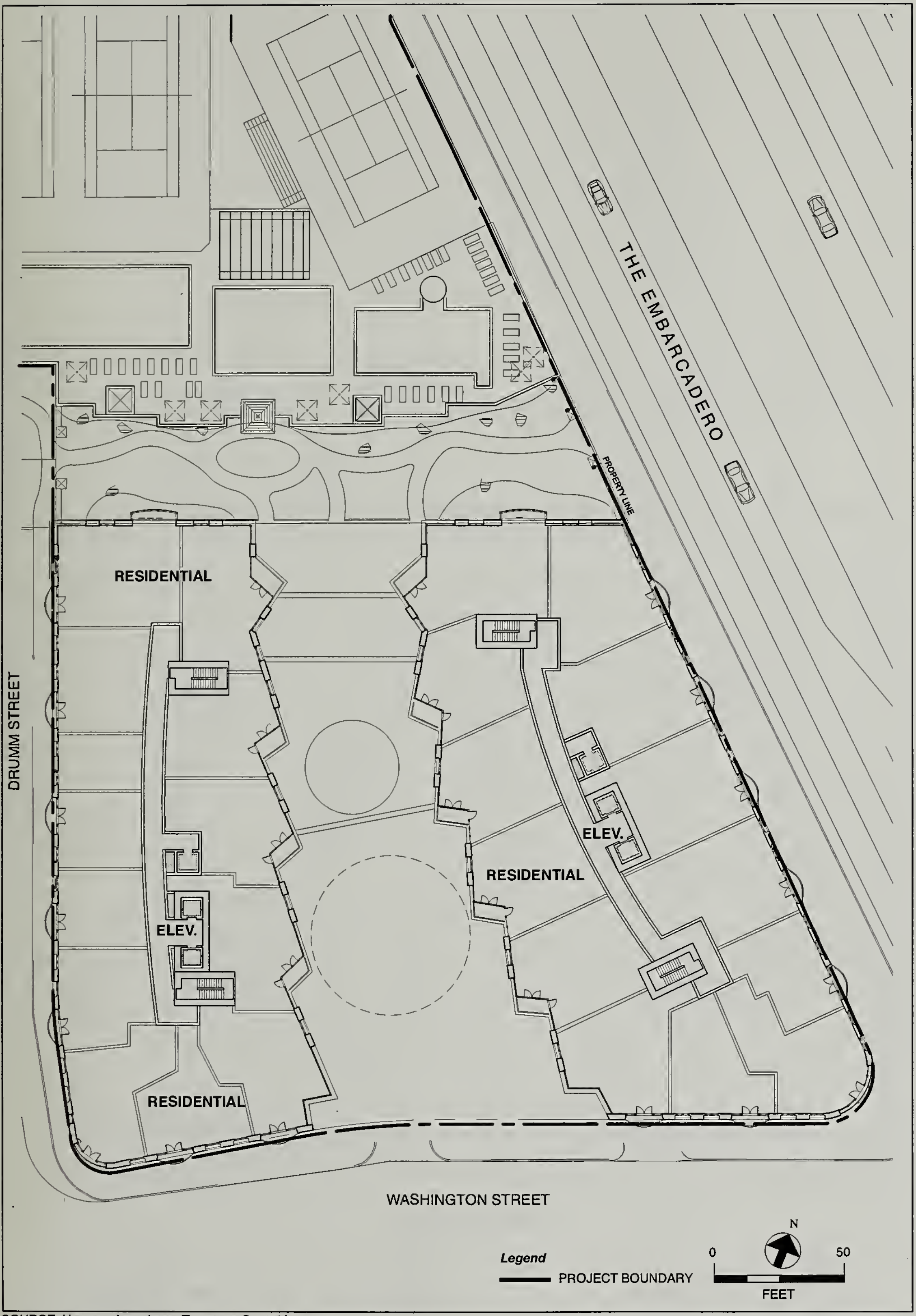


SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 9: PROPOSED SECOND FLOOR PLAN



SOURCE: Hannum Associates, Turnstone Consulting

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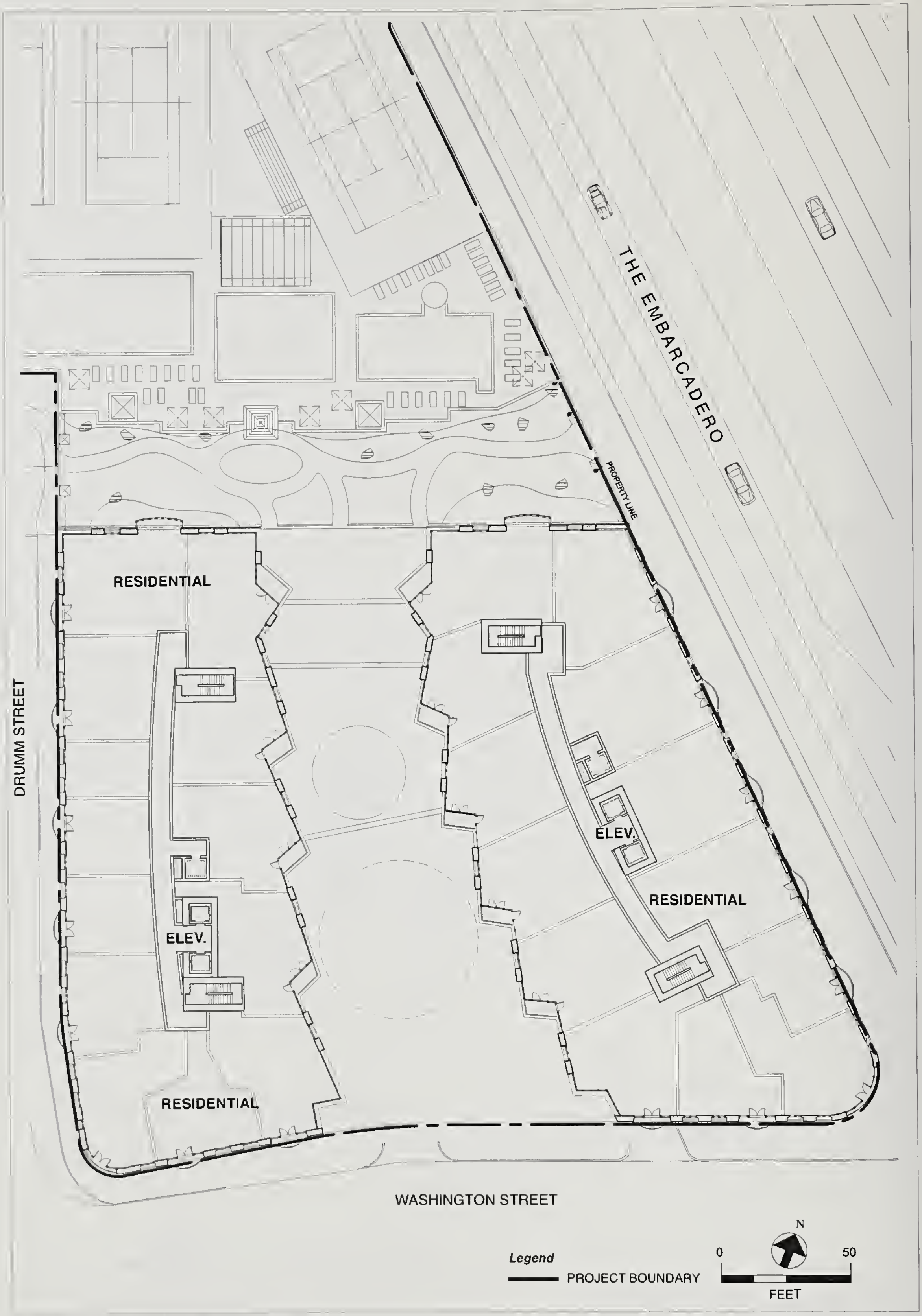
FIGURE 10: PROPOSED THIRD TO FIFTH FLOOR PLANS

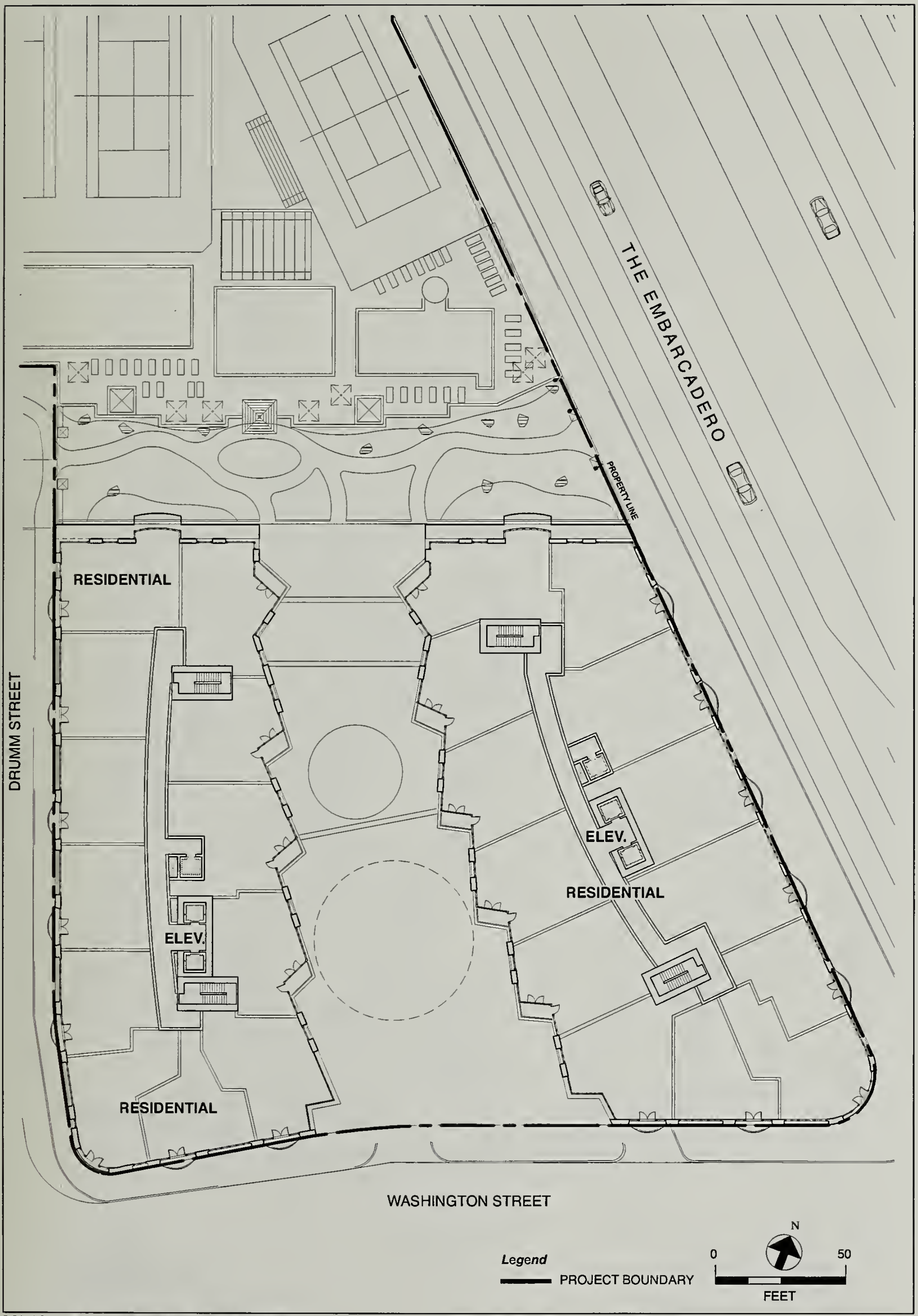


SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 11: PROPOSED SIXTH FLOOR PLAN



SOURCE: Hannum Associates, Turnstone Consulting

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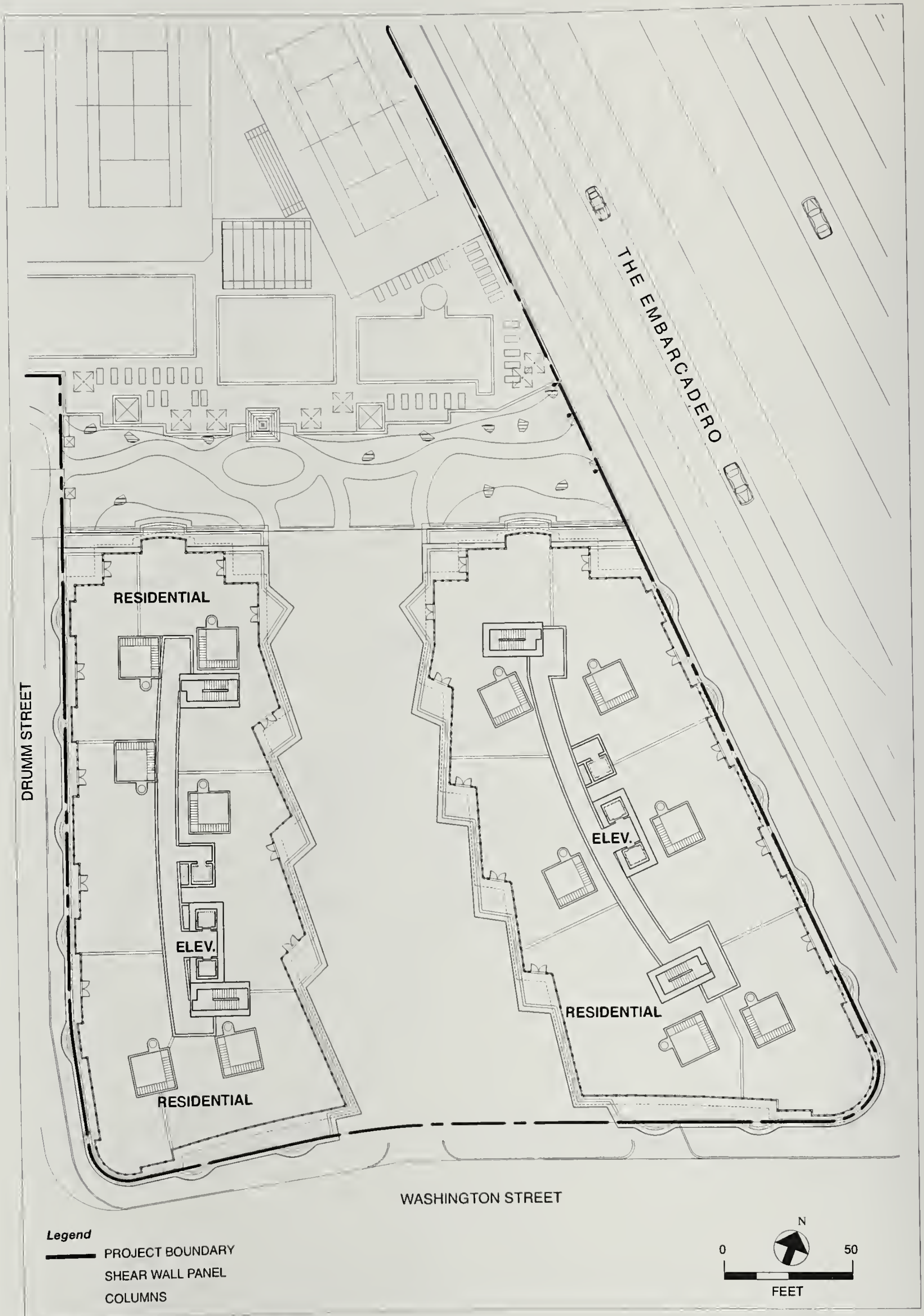
2007.0030E

FIGURE 12: PROPOSED SEVENTH FLOOR PLAN

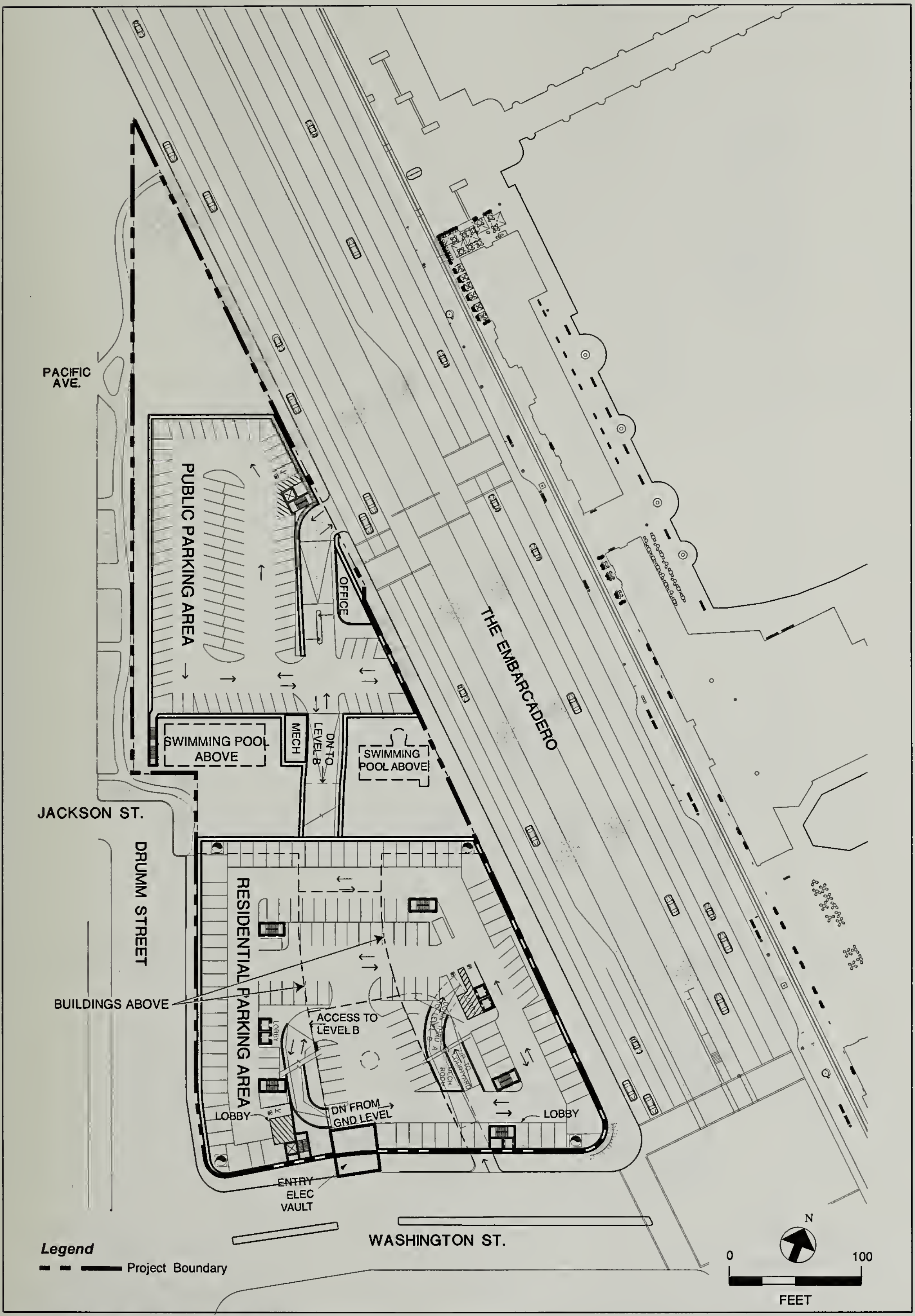


SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 13: PROPOSED EIGHTH FLOOR PLAN

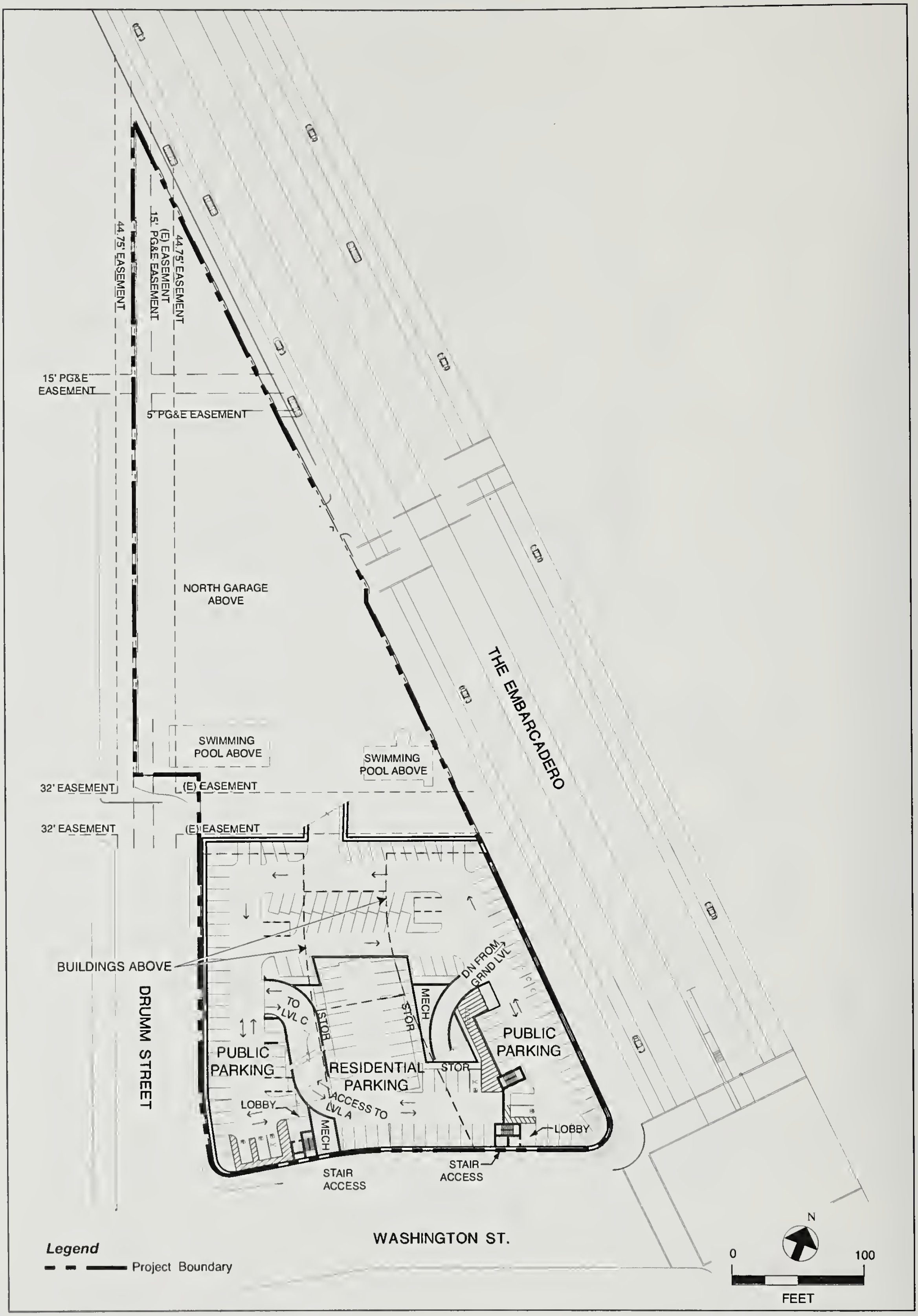


SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 14: PROPOSED PARKING LEVEL A PLAN

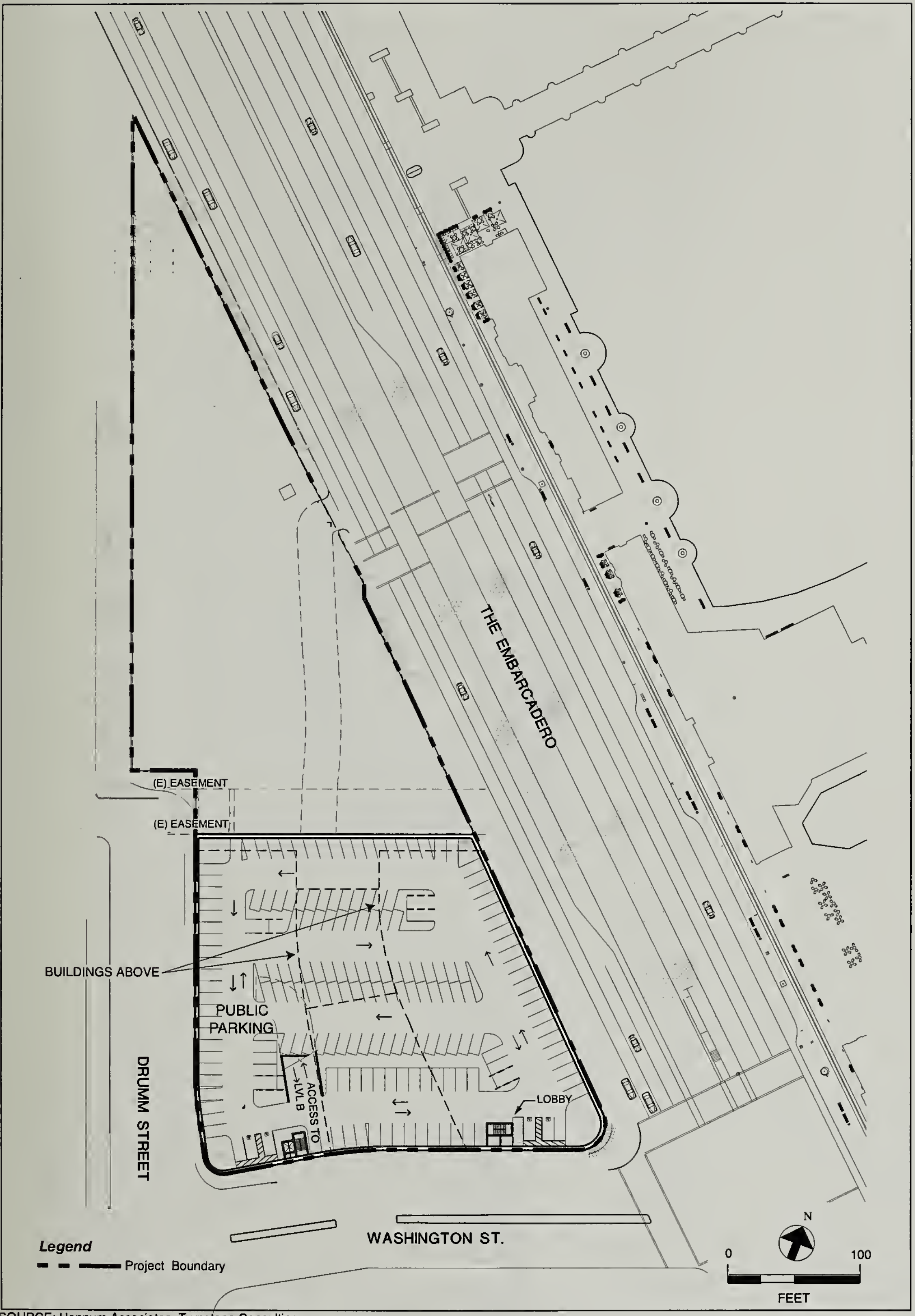


SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

2007.0030E

FIGURE 15: PROPOSED PARKING LEVEL B PLAN

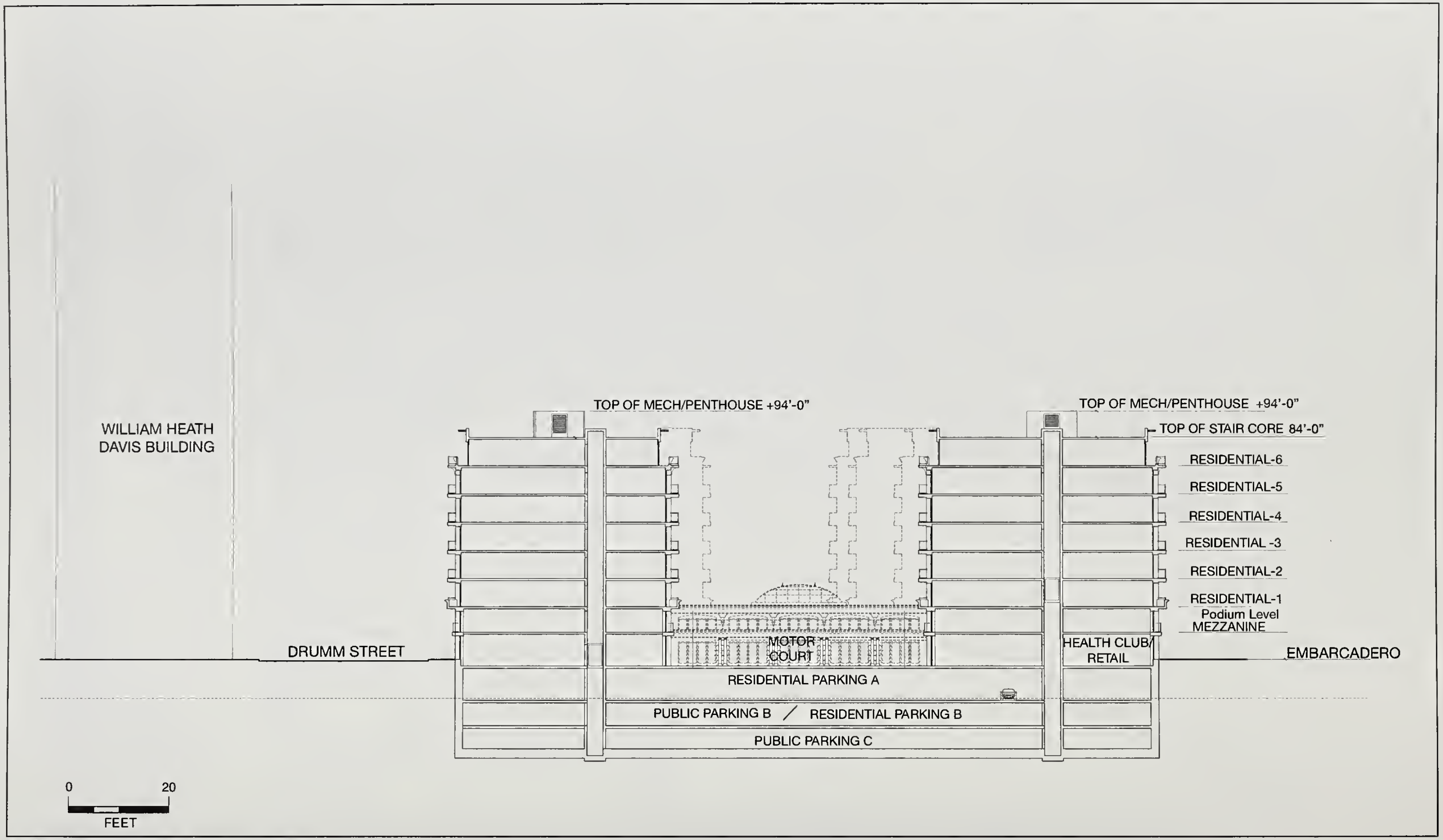


SOURCE: Hannum Associates, Turnstone Consulting

8 WASHINGTON STREET / SEAWALL LOT 351

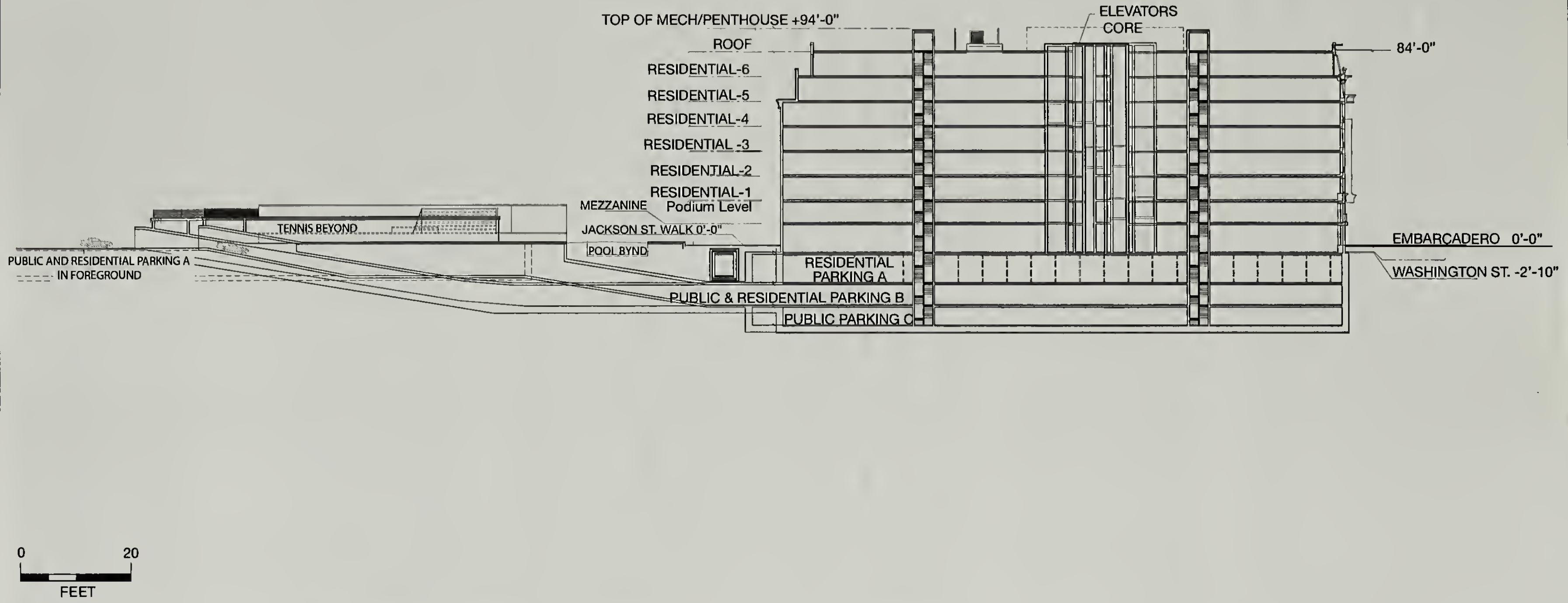
2007.0030E

FIGURE 16: PROPOSED PARKING LEVEL C PLAN



SOURCE: Hannum Associates, Turnstone Consulting

FIGURE 17: PROPOSED EAST-WEST SECTION



SOURCE: Hannum Associates, Turnstone Consulting

FIGURE 18: PROPOSED NORTH-SOUTH SECTION

Pedestrians would access the parking garage through public access areas on the Washington Street side of the proposed buildings and along The Embarcadero. Elevators would connect the underground parking to the building lobby. Vehicle access to the parking below the buildings would be through a one-way entrance ramp directly off of Washington Street and a one-way exit ramp, connected to the interior courtyard; the northern part of the parking garage would be accessed through a two-way driveway along The Embarcadero. As a result of the proposed curb cut for the garage entrance, three metered parking spaces along The Embarcadero would be removed and a bus stop for the MUNI 12-Folsom line would be relocated.

The proposed parking would include approximately 520 spaces, with approximately 170 spaces for residents and 350 spaces for retail uses and the public. The proposed parking would replace the existing 17 surface spaces used for the health club and 110 surface spaces on Seawall Lot 351.

Proposed Health Club Facilities

The project sponsor proposes to construct six tennis courts on the northern part of the project site, Assessor's Block 168/Lot 58 and Block 171/Lot 69, to replace in part the nine existing tennis courts that would be removed for construction of the project. Two outdoor swimming pools would be constructed south of the tennis courts and would replace the two existing pools to be removed. The tennis courts would occupy about 40,100 sq. ft., and the pools and related outdoor space for the health club would occupy about 25,500 sq. ft. The Golden Gateway Tennis & Swim Club would control and operate the tennis courts and pools. Besides being used for general membership activities, the Club might also continue to be used for children's summer camps with priority for dues-paying club members, but with additional space allocated to the general public. This is the Club's current operating policy, and camp activity levels are anticipated to be similar with the project.[6]

The existing indoor health club facility, currently located across Drumm Street at the Golden Gateway Center, would move into the first floor of the proposed buildings. The health club facility across Drumm Street would continue to operate during construction. The existing tennis courts and pools would be closed at the outset of project construction and the proposed facilities would open after construction of the north parking garage. After the existing health club is relocated, the space used by the facility would be converted into a storage and garage area for Golden Gateway maintenance staff.

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[6] The Golden Gateway Tennis & Swim Club has operated summer kids camp programs for 11 years. Programs offered in 2007 include kids camp, after-camp sport conditioning, mini camp, aquatics camp, and youth social activities. The total camp capacity for the summer is 722 children; enrollment to date for 2007 (June and July only) is 461 children. *Golden Gateway Tennis & Swim Club Kids Programs Summer Guide 2007*; Fernandez, Nestor, Regional Manager, Western Athletic Clubs, personal communication to Paul Osmundson, San Francisco Waterfront Partners II, July 9, 2007.

Proposed Open Space and Landscaping

According to *Planning Code* Section 135, the residential open space requirements for the proposed project would be about 36 sq. ft. of private open space per residential unit, with a ratio of 1.33 of common usable open space—about 48 sq. ft.—for each residential unit that may be substituted for private open space. These requirements would translate into 6,120 sq. ft. of private open space (170 units multiplied by 36 square feet per unit) or about 8,140 sq. ft. if all open space were common for the use of all residents (6,120 square feet times 1.33).

Proposed open spaces would include private open space for the residents, common open space for the residents, and space accessible to the public. The project would include approximately 15,000 sq. ft. of private open space, in the form of decks and terraces for individual residential units. Proposed common open space for the residents would total approximately 700 sq. ft., and would include lobby space on the second floor of the buildings. The proposed open space would exceed the open space requirements of the *Planning Code.*

Shared open space that would be open to the public would include an 8,700-sq.-ft. corridor north of the proposed buildings ("The Common"). The Common would align with the Jackson Street right-of-way and is intended to enhance pedestrian connectivity and enhance views toward the waterfront along Jackson Street. Other publicly accessible open space would total about 5,700 sq. ft. in areas at the north and south ends of the project site. (These open spaces are shown on Figure 3, p. 8.)

Fifty existing street trees on the adjacent Drumm and Washington Street and Embarcadero sidewalks would be removed as part of the proposed project. In addition, 86 trees within the project site would be removed. The sponsor has indicated that new trees would be planted in at least a 1:1 ratio to replace those removed, in conformity with San Francisco Public Works Code requirements. The landscaping plan for the project site would avoid invasive plant species and would favor local and drought-tolerant plants.

The proposed landscaping would also be intended to fulfill LEED prerequisites and credit requirements related to stormwater management, as well as the guidelines for Low Impact Development being prepared by the San Francisco Public Utilities Commission (SFPUC).[7] In addition to the green roof mentioned previously, the project sponsor plans to include features such as reduced-permeable surfaces, retention basins, and/or bioswales (vegetated channels that act as filters) in the landscaped areas.

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[7] San Francisco Public Utilities Commission, http://sfwater.org/home.cfm (Wastewater/ Water Pollution Prevention/ Stormwater Management), accessed March 21, 2007.

Proposed Foundation and Earthwork

The proposed buildings would have a pile foundation system supporting a thick mat. The estimated depth of proposed excavation would be as much as 38 feet below the ground at the site of the proposed buildings (with excavation of as much as about 40 feet deep for the elevator pit), 14 feet to 22 feet at the site of the proposed parking to the north, and 2 feet to 4 feet beneath the tennis courts at the north end of the site. Approximately 110,000 cubic yards of soil would be removed from the project site.

Project Construction

Project construction, including demolition, site and foundation work, construction of the parking garage, and construction of the buildings, would take 27 to 29 months. Assuming that construction would begin in early 2009, the buildings would be ready for occupancy in 2011. The first phase of construction would take about 11 months, and would include demolition, shoring, excavation, and pile driving. Mass excavation would take about 2½ months during that time.

Required Approvals

The project would require the following approvals:

- Authorization to offer SWL 351 for development by the Port Commission;
- Review and approval of a Planned Unit Development/Conditional Use Permit by the Planning Commission, pursuant to *Planning Code* Sections 303 (Conditional Use), 304 (PUD), 253 (review of structures over 40 feet in any "R" District), 271 (bulk exception), 151 and 204.5(c) (accessory parking for residential uses), and 134 (rear yard requirement);
- Conditional Use authorization for the proposed change in use and reduction in size of the Golden Gateway Tennis & Swim Club, pursuant to Board of Supervisors Resolution 723-06 if in effect at the time of project approval (as further discussed in Section C below);
- Amendment to the zoning map of the applicable portion of Seawall Lot 351 to be conveyed from the Port to the developer for tower development, from "P" to "RC-4," through approval by the Board of Supervisors upon recommendation of the Planning Commission;
- Approval by the Port Commission of a disposition agreement and related transfer documents for Seawall Lot 351 and by the Board of Supervisors of the disposition documents;
- Approval by the Port Commission, Board of Supervisors, and State Lands Commission of an agreement to exchange or remove the public trust limitations from Seawall Lot 351;
- Approval of Tentative and Final Subdivision Maps;
- Approval by the San Francisco Department of Public Works of the proposed removal of street trees and "significant trees";

- Approval by the San Francisco Department of Public Works of proposed curb cuts along The Embarcadero and Washington Street;

- Approval by the San Francisco Municipal Transportation Agency and Board of Supervisors of a relocated bus zone for the MUNI 12-Folsom line; and

- Issuance of demolition and building permits by the Department of Building Inspection.

- In connection with the above-described project approvals, the City must make certain other findings and referrals as described below:

    - Shadow impact determination by the Planning Commission, after review and report by the San Francisco Recreation and Park Department and Commission under Section 295 of the *Planning Code*; and

    - A determination by the Planning Commission of consistency with the *General Plan* and Priority Policies, pursuant to Charter Section 4.105 and Administrative Code Section 2A.53.

In addition, the San Francisco Redevelopment Agency would make a finding of consistency with the *Redevelopment Plan,* or delegate its authority to the Planning Commission for those parcels that remain in the jurisdiction of the Redevelopment Agency.

The required approvals are discussed in more detail later in this Initial Study.

B. PROJECT SETTING

The land immediately to the west and northwest of the project site is occupied by Golden Gateway Center and Golden Gateway Commons, which are high-density residential communities on the periphery of the Downtown Financial District. Golden Gateway Center includes four towers (Richard Henry Dana House, William Heath Davis House, Buckelew House, and Macondray House) and townhouses within the area bounded by Drumm, Washington, Battery, and Jackson Streets. The four towers range from 22 to 25 stories in height; the residential units are constructed over two-story garage blocks and ground-floor commercial space. Golden Gateway Commons includes three structures within the area bounded by Drumm Street, Jackson Street, Front Street, and Broadway. The buildings are four to five stories with two levels of offices and stores and two to three stories of residential units. Golden Gateway Center and Golden Gateway Commons together contain about 1,400 residential units.

The land immediately to the south and southwest of the project site is occupied by public open spaces and other public uses on Assessor's Blocks 202 and 203. Block 202 is dedicated open space (Embarcadero Plaza I) under the jurisdiction of the Recreation and Park Department. The above-surface southern portion of the block was transferred by ordinance to the Recreation and Park Department in May 2001. Block 203 contains a pump station and maintenance yard under the jurisdiction of the San Francisco Public Utilities Commission, and public open space

(Embarcadero Plaza II, or Ferry Park) under the jurisdiction of the Recreation and Park Department (also acquired in 2001). In the western part of Block 203, a walkway leads up to an elevated deck area and pedestrian bridge connecting to Maritime Plaza, a podium-level open space that surrounds the Alcoa Building to the west.

Across The Embarcadero east of the project site are Piers 1, 1-1/2, 3 and 5. Pier 1 is occupied by offices (for the Port of San Francisco and others) and restaurants. Piers 1-1/2, 3 and 5 were rehabilitated and re-opened in fall 2006 for office, restaurant, and retail uses and public open space. In addition, Pier 3 provides parking and dock space for excursion boat operations.[8] Opposite the end of Broadway Street is Pier 7, a public promenade that extends about 900 feet into the Bay. Within three blocks to the south are the Embarcadero Center, a five-block complex with four office buildings, three levels of shopping, a hotel, and below-ground parking; Justin Herman Plaza and the Vaillancourt Fountain; and the Ferry Building, which has been renovated and supports a ground-floor marketplace, upper-floor offices, and an outdoor farmer's market that is open on Tuesdays and Saturdays.[9]

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	Applicable	Not Applicable
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	☒	☐
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☒	☐
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☒	☐

Approvals Required

The San Francisco *Planning Code* implements the *San Francisco General Plan*, and governs permitted uses, densities, and configuration of buildings within San Francisco. The *Planning Code* incorporates the City Zoning Maps by reference. Permits to construct new buildings or to alter or demolish existing ones may not be issued unless the proposed project conforms to the *Planning Code* or an exception or variance is granted pursuant to provisions of the *Planning Code*.

The three parcels owned by the Golden Gateway Center are within the Golden Gateway Redevelopment Project Area. Two of those parcels (Assessor's Block 168/Lot 58 and Block

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[8] Esterkamp, Alicia, Director of Marketing, San Francisco Waterfront Partners II, telephone communication, September 6, 2006; http://www.thepierssf.com/, accessed February 6, 2007.

[9] Ferry Building Marketplace web site, http://www.ferrybuildingmarketplace.com/, accessed June 20, 2007.

171/Lot 69) are subject to the land use controls in the *Redevelopment Plan.*[10] The *Redevelopment Plan* states that its requirements and restrictions on development are in addition to all zoning and building ordinances "now or hereinafter in force." The *Planning Code* would apply to the extent the *Redevelopment Plan* does not expressly or by implication pre-empt the *Planning Code.* If, subsequent to project approval by the Planning Commission, the jurisdiction of the Redevelopment Agency has ended for Assessor's Block 171/Lot 69 and/or Assessor's Block 168/Lot 58, the Redevelopment Agency would have no role in approvals for the block(s), and the provisions of the *Redevelopment Plan* do not apply. For this part of the project site, the discussion of approvals required addresses the relevant land use controls in the *Redevelopment Plan* and the authorizations that would be required under the *Planning Code.* The remainder of the site (Assessor's Block 201/Lot 12 and Seawall Lot 351) is subject to all of the relevant land use controls in the *Planning Code.*

Land Use Controls – Golden Gateway *Redevelopment Plan* (Blocks 168 and 171). On Blocks 168 and 171, the *Redevelopment Plan* permits residential uses, with neighborhood shopping, general commercial, and office uses allowed below the lowest story intended for dwelling purposes. The allowed density is 160 to 300 persons per net acre; the maximum height is 84 feet. The maximum land coverage by buildings up to 40 feet tall (above the lowest residential floor) is 40 percent of the net land area. The *Redevelopment Plan* includes requirements for parking spaces to serve residential, office, and commercial uses, and states, "combined use of off-street parking facilities shall be subject to the approval of the Agency."[11]

Above ground, the proposed project would include tennis courts and pools, the same types of uses as are present today. These uses were originally approved for the project site as part of the *Redevelopment Plan*, and the continued presence of these uses appears to be consistent with the *Redevelopment Plan.* If Assessor's Block 171/Lot 69 and/or Assessor's Block 168/Lot 58 remain within the jurisdiction of the Redevelopment Agency, the Redevelopment Agency Commission would make findings of consistency of the proposed subsurface north parking garage on Assessor's Block 168/Lot 58 and Block 171/Lot 69 with the *Redevelopment Plan* or delegate its authority to the Planning Commission.

Land Use Controls – Planning Code (Block 201 and Seawall Lot 351). The proposed buildings and part of the proposed underground parking would be developed on this part of the project site. Block 201 is zoned RC-4 (Residential/Commercial Combined: High Density). RC-4 use districts provide for a mixture of high-density dwellings (at a maximum ratio of one dwelling unit for each 200 sq. ft. of lot area) and supporting commercial uses. The high-density and mixed-use nature of these districts is recognized by certain reductions in off-street parking requirements. At 170 proposed residential units, the project is within the applicable dwelling unit density. The proposed commercial uses on the ground floor (the retail, restaurant, and office uses, and the private recreational club) are also permitted uses in an RC-4 District.[12]

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[10] Per Section 1301 of the Plan, the land use controls do not apply to Assessor's Block 201/Lot 12. Redevelopment Agency of the City and County of San Francisco, *Embarcadero-Lower Market (Golden Gateway) Redevelopment Plan*, November 20, 1995, p. 19 and Map B.

[11] Redevelopment Agency of the City and County of San Francisco, *Embarcadero-Lower Market (Golden Gateway) Redevelopment Plan*, November 20, 1995, pp. 9-10 and Map B.

Seawall Lot 351 is zoned P (Public). The P District applies to land that is owned by a governmental agency and is in some form of public use. As the proposed development would not be a public use, an amendment to the zoning map would be required to change the designation for the applicable part of Seawall Lot 351 from "P" to "RC-4."

Planned Unit Development/Conditional Use Approvals. The project is proposed as a Planned Unit Development pursuant to *Planning Code* Section 304, which provides for Planning Commission review and approval of Planned Unit Developments. Planned Unit Development is intended for projects on large sites (generally more than one-half acre) developed as integrated units where outstanding design responsive to the surrounding environment may merit modification of certain provisions contained elsewhere in the *Planning Code*. The review procedures and criteria are those for Conditional Use (CU) under *Planning Code* Section 303, as well as additional criteria set forth in *Planning Code* Section 304. The required approvals under CU for Planned Unit Development are as follows:

- Review of Proposed Buildings Exceeding a Height of 40 feet in R Districts, *Planning Code* Section 253

  The project site is within an 84-E height and bulk district, which allows construction up to 84 feet in height. The proposed buildings would be 84 feet tall, meeting the height limit. *Planning Code* Section 253 requires CU authorization by the Planning Commission for buildings exceeding 40 feet in height in an R District. Additional criteria for this CU are set out in *Planning Code* Sections 253(a) and (b).

- Special Bulk Exceptions, *Planning Code* Section 271

  At and above 65 feet, the 84-E bulk district allows a maximum plan length of 110 feet and a maximum diagonal plan dimension of 140 feet. At the seventh floor (the lowest floor that reaches 65 feet and above), the proposed buildings would have lengths of approximately 240 feet and maximum diagonal plan dimensions of approximately 250 feet to 275 feet. Therefore, the proposed project would exceed these bulk limitations. *Planning Code* Section 271 provides for special exceptions to bulk limits in order to achieve a better design than would be achieved through strict adherence to the bulk requirements. The review procedures and criteria for this bulk exception are those for CU under *Planning Code* Section 303, as well as additional design criteria set forth in *Planning Code* Sections 271(c)(1), (2) and (3).

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[12] Under Sections 209.8(c) and 209.8(d), commercial uses within RC-4 Districts are regulated by the controls for C-2 Districts (Sections 218 through 227).

- Parking in Excess of Accessory Amounts, *Planning Code* Sections 151 and 204.5(c)

  The proposed project would include up to 520 parking spaces. Of these, 170 spaces would be allocated for the proposed 170 residential units. *Planning Code* Section 151 requires one parking space for every four dwelling units in the RC-4 District (43 spaces for the proposed project). *Planning Code* Section 204.5(c) classifies 150 percent of required residential parking, or about 65 spaces for the proposed project, as accessory. Thus, the proposed residential parking supply would exceed the amount allowable without CU authorization.

  The project would include spaces for the retail uses and health club in compliance with the *Planning Code* requirements for accessory parking for those uses. The proposed public spaces would be a permitted use and would not require special approval.

- Planned Unit Development Approval in Lieu of Rear Yard Requirement

  Planning Code Section 134 requires a minimum rear yard depth of 25 percent of the total lot depth in RC-4 Districts, but in no case less than 15 feet, at the lowest residential story. The proposed project would not conform to the rear yard requirement and would require approval under the procedures and criteria for Planned Unit Development, in lieu of the rear yard requirement of Section 134.

- Housing Requirements for Residential Development Projects

  Planning Code Section 315 sets forth the requirements and procedures for the Residential Inclusionary Affordable Housing Program. Under Section 315.3(a)(2) this requirement applies to projects that consist of five or more units and require Planning Commission approval as a conditional use or planned unit development. Section 315.4(a)(1) establishes that 15 percent of all units constructed on the project site shall be affordable to qualifying households. Alternatively, the project sponsor could elect to satisfy the requirements by constructing 20 percent of all units off site pursuant to Section 315.5, pay an in lieu fee in accordance with Section 315.6, or utilize a combination of the three alternatives. Off-site units must be located within one mile of the project. To comply with the requirements of the *Planning Code*, the project sponsor would construct 34 units of affordable housing off site.

Conditional Use Authorization: Change in Use and Reduction in Size of Health Club Facilities. Board of Supervisors Resolution 723-06, passed December 12, 2006, imposes interim zoning controls establishing a requirement for Conditional Use authorization for a change in use or reduction in size of any recreational space of 15,000 sq. ft. or more, including indoor or outdoor facilities, for an 18-month period. The proposed project would change the use of part of the project site from health club facilities to residential and commercial uses. The project would result in an overall net reduction of approximately 6,400 sq. ft. of recreational space, but would reduce the amount of tennis court space by about 19,300 sq. ft. The interim controls expire on May 20, 2008, which is 18 months after the effective date of the Resolution. Under Section 306.7 of the *Planning Code*, interim controls may be extended for up to a total of 24 months.

Conditional Use authorization would be required if these interim controls were still in effect at the time of project approval.

Transaction Documents for Seawall Lot 351. Before the project could proceed, the Port Commission would have to authorize offering Seawall Lot 351 to the project sponsor for development and direct staff to negotiate the terms and conditions upon which the Port would agree to consider disposition and development of a portion of Seawall Lot 351 as proposed. The Port Commission subsequently would have to approve a Disposition Agreement and related disposition documents (collectively, the "Transaction Documents") governing the project sponsor's development and the Port's disposition of Seawall Lot 351. The Transaction Documents would contain the terms and conditions of the Port's approval of the project on Seawall Lot 351, the Port's disposition of Seawall Lot 351 to the project sponsor, and the project sponsor's development conditions and obligations. Both the Port Commission and the Board of Supervisors must approve the disposition contract.

Public Trust Agreement. Seawall Lot 351 is subject to the public trust. The public trust doctrine as developed in California limits uses of trust lands to those that are water- dependent or related, including commerce, fisheries, navigation, environmental preservation and recreation. Ancillary or incidental uses that directly promote trust uses, are directly supportive and necessary for trust uses, or that accommodate the public's enjoyment of trust lands are also permitted, such as hotels, restaurants, shops and parking areas. Non-water oriented private uses such as general office and residential uses are not considered public trust uses. The public trust use limitations are also incorporated into the Burton Act (Stats. 1968, Ch. 1333). The Burton Act is the legislative grant that authorized the transfer of San Francisco's submerged and filled tidelands from the State to the City, and sets forth the terms under which the property is to be held in trust by the San Francisco Port Commission.

The development of Seawall Lot 351 for residential use would require the removal of the public trust restrictions. The removal of the trust can be accomplished by an exchange for other non-trust property of equivalent value, or a State legislative action. If an exchange were used, the Port would enter into an exchange agreement with the State Lands Commission and the project sponsor that provides for conveyance of Seawall Lot 351 to the developer and an alternative trust parcel to the City (to be held by the Port subject to the public trust). This process would include approvals by the Port Commission, San Francisco Board of Supervisors, and State Lands Commission.

Other Approvals. The project would also require approval of Tentative and Final Subdivision Maps by the Department of Public Works, approval of a relocated bus zone by the San Francisco Municipal Transportation Agency and Board of Supervisors, and approval of demolition and site permits by the Department of Building Inspection and Department of Public Works. The City must also take other actions in connection with the above-described project approvals, including a shadow impact determination by the Planning Commission, after review and report by the San Francisco Recreation and Park Department and Commission under Section 295 of the *Planning Code,* and a determination by the Planning Commission of consistency with the *General Plan* and Priority Policies, pursuant to Charter Section 4.105 and Administrative Code Section 2A.53.

Conflicts with Adopted Plans and Goals

San Francisco General Plan. The San Francisco Planning Commission adopted an updated Housing Element of the *General Plan* in May 2004. The San Francisco Board of Supervisors approved the Housing Element in September 2004, and the State Department of Housing and Community Development certified the Element in October 2004. In June 2007, however, the First District Court of Appeals ruled that the updated Housing Element should have been addressed in an EIR. Therefore, this Initial Study refers to relevant policies of both the 2004 Housing Element and the 1990 Residence Element (the next most recent version).

The 2004 Housing Element of the *General Plan* "sets forth objectives, policies, and implementing programs to address the critical housing needs" of the City. The 2004 Element addresses the City's goals "of achieving decent, suitable, and affordable housing for current and future San Franciscans." The City intends to address the issues of housing production and affordability in part through a Citywide Action Plan (CAP), which "explores comprehensively the issue of how to meet the need for housing and jobs in ways that capitalize upon and enhance the best qualities of San Francisco as a place." CAP initiatives include (among others) the Better Neighborhoods Program and planning for the Downtown Neighborhoods; these initiatives do not include the project site.

The objectives of the 2004 Housing Element address new housing supply, housing retention, housing condition, affordability, housing choice, homelessness, density/design/quality of life, and State and regional needs. With regard to housing production, Policy 1.1 of the 2004 Housing Element encourages higher residential density in areas adjacent to downtown and locating housing in areas well served by transit. This policy is similar to Policy 1.1 in the 1990 Residence Element; the 2004 Housing Element also calls for allowable densities in established residential areas to be set at levels that will promote compatibility with prevailing neighborhood scale and character.

Policy 1.5 of the 2004 Housing Element supports the development of affordable housing on surplus public lands. This policy is a modified version of the 1990 Residence Element policy, which calls for promoting the development of permanently affordable housing on surplus, underused, and vacant public lands.

Relevant housing affordability policies in the 2004 Housing Element include Policy 4.2, which calls for affordable units in larger housing projects. This policy is the same as Policy 7.2 in the 1990 Residence Element. Density/design/quality of life policies in the 2004 Housing Element include Policy 11.1, a new policy which calls for using new housing as a means to enhance neighborhood vitality and diversity, and Policy 11.5, which promotes well-designed housing that enhances existing neighborhood character. The corresponding policy in the 1990 Residence Element calls for housing that conserves existing neighborhood character.

The proposed project would contribute about 170 units to the City's housing supply, thereby helping to meet the City and regional needs for housing. In addition, the sponsor would construct 34 units of affordable housing off site, in compliance with the City's Residential Inclusionary Affordable Housing Program. The project would be served by several MUNI lines and would be near the BART Embarcadero station and the Downtown Ferry Terminal. The project would include retail/commercial uses that could enhance the streetscape along The Embarcadero and Washington and Drumm Streets. The project would increase the density of the project site and vicinity, and the proposed buildings would be taller than the existing uses on the project site. The potential impacts of the project on visual quality and neighborhood character are discussed in Sections E.1 (Land Use and Land Use Planning) and E.2 (Aesthetics) of this Initial Study.

Northeastern Waterfront Area Plan. The project site is included within the *Northeastern Waterfront Area Plan* of the *San Francisco General Plan*. Policy 1.2 of the Plan states, "consistent with other policies of this Plan, encourage uses on Port property which return revenue to the Port to support and improve its facilities." Policy 5.3 states, "allow general and specialty retail uses in combination with other uses which will not significantly detract from the Downtown Retail District." Objective 6 of the Area Plan is to "develop and maintain residential uses along the Northeastern Waterfront in order to assist in satisfying the City's housing need and capitalize on the area's potential as a desirable living environment."[13]

The project site is within the Ferry Building Subarea of the Plan area. The entire project site is designated "High Density Residential" on the Ferry Building Subarea land use map.[14] Policy 26.1 relates specifically to the Golden Gateway area and the project site by Assessor's Block Numbers and states "[m]aintain the Golden Gateway residential community and neighborhood-serving retail uses."[15] The proposed project would not obviously or substantially conflict with these policies.

Waterfront Land Use Plan. Seawall Lot 351 is within the Ferry Building Waterfront Subarea of the *Port of San Francisco Waterfront Land Use Plan*. This area extends from Pier 5 to the

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[13] *Northeastern Waterfront Area Plan*, "Objectives and Policies," http://www.sfgov.org/site/planning_index.asp?id=42935, accessed September 21, 2006.

[14] "Ferry Building Subarea Generalized Land Use Map," *Northeastern Waterfront Area Plan*, http://www.sfgov.org/site/planning_index.asp?id=42935, accessed September 21, 2006.

[15] *Northeastern Waterfront Area Plan*, "Ferry Building Subarea," http://www.sfgov.org/site/planning_index.asp?id=42935, accessed September 21, 2006.

Agriculture Building and includes Piers 1/2, 1, 1-1/2, and 3, the Ferry Building and Ferry Plaza.[16] Land uses identified as acceptable on Seawall Lot 351 include residential, open space, parking, retail, and recreational (among others). One of the development standards for the Ferry Building Mixed Use Opportunity Area states, "explore the possibility of obtaining economic value from Seawall Lot 351 by combining it with the adjacent Golden Gateway residential site to provide expanded opportunities for mixed residential and commercial development."[17] The proposed residential, retail, recreational, and parking uses would be consistent with the uses considered acceptable on Seawall Lot 351.

The Waterfront Design & Access Element is a component of the *Waterfront Land Use Plan*, and is intended to guide the physical form of waterfront revitalization. The Design & Access Element provides policy for the preservation and development of public access and open space, views, and historic resources, as well as architectural design criteria that will be applied to new development. Development of seawall lots, including Seawall Lot 351, must be consistent with the Public Trust, and should respect the scale and architectural character of the adjacent City neighborhoods. Seawall lot development should also maintain the City street corridor views identified in the Element, including views along Washington Street. The Element's design criteria for Seawall Lot 351 include bold forms of similar height to the bulkhead buildings across The Embarcadero; maximum lot coverage; orientation of primary uses and pedestrian entrances toward The Embarcadero; use of transparent materials in the ground floor; use of recessed building envelopes along The Embarcadero; and location of service and parking access away from The Embarcadero.[18] Issues relating to building scale, architectural character, and views will be addressed as part of the analysis of aesthetic issues in the EIR; consistency with the public trust will be addressed as part of the analysis of land use issues in the EIR; and the location of service and parking access points will be addressed as part of the analysis of transportation issues in the EIR.

The *Waterfront Land Use Plan* allows for certain non-trust uses on seawall lots, including residential use on Seawall Lot 351, if the Port determines the lots are surplus to the trust and an exchange is approved by the State Lands Commission. A development in furtherance of such an exchange would be considered consistent with applicable Public Trust principles.

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[16] According to the *Port of San Francisco Waterfront Land Use Plan*, a number of potential uses could be developed on Seawall Lot 351 including open space, residential, commercial (retail and office), recreational, or community facilities uses. See San Francisco Port Commission, *Port of San Francisco Waterfront Land Use Plan,* Ferry Building Waterfront Acceptable Land Use Table, p. 126.

[17] *Port of San Francisco Waterfront Land Use Plan*, republished version, October 2002, p. 129.

[18] *Port of San Francisco Waterfront Design & Access*, republished version, June 2004, pp. 4, 63, 92, 101.

Golden Gateway *Redevelopment Plan*. As noted in the discussion of approvals required, Assessor's Block 168/Lot 58 and Block 171/Lot 69 are subject to the land use controls in the *Redevelopment Plan* through May 19, 2008 for Block 171 and through January 1, 2009 for Block 168. The proposed use of these lots for tennis courts and pools would retain the same types of uses as are present today. The existing tennis courts and pools were constructed as part of Phase II of the residential portion of the Golden Gateway Redevelopment Project.[19] Therefore, the continued presence of these uses appears to be consistent with the *Redevelopment Plan*. The *Redevelopment Plan* does not specifically address the proposed use of the area below ground for parking; if Assessor's Block 171/Lot 69 and/or Assessor's Block 168/Lot 58 remain within the jurisdiction of the Redevelopment Agency, the Redevelopment Agency Commission would make findings of consistency of the proposed subsurface parking garage on Assessor's Block 168/Lot 58 and Block 171/Lot 69 with the *Redevelopment Plan* or delegate its authority to the Planning Commission.

Evaluation and Consideration of Plans and Policies. The *San Francisco General Plan* provides general policies and objectives to guide land use decisions. Any conflicts between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects. The compatibility of the proposed project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City *Planning Code* to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural and Paleontological Resources); and (8) protection of open space (Questions 8a and b, Wind and Shadow, and Questions 9a and c, Recreation and Public Space). Prior to issuing a permit for any project which requires an Initial

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[19] San Francisco Redevelopment Agency web site, Golden Gateway, http://www.sfgov.org/site/sfra_page.asp?id=5586, accessed June 21, 2007.

Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the Evaluation of Environmental Effects, providing information for use in the case report for the proposed project. The case report and approval motions for the project will contain the Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect one or more topics within the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

☐ Land Use
☒ Aesthetics
☐ Population and Housing
☒ Cultural/Paleontological Resources
☒ Transportation and Circulation
☒ Noise
☒ Air Quality
☒ Wind and Shadow
☐ Recreation
☐ Utilities and Service Systems
☐ Public Services
☒ Biological Resources
☐ Geology and Soils
☐ Hydrology and Water Quality
☒ Hazards/Hazardous Materials
☐ Mineral/Energy Resources
☐ Agricultural Resources
☒ Mandatory Findings of Signif.

1. Effects Found to be Potentially Significant

This Initial Study evaluates the proposed 8 Washington/Seawall Lot 351 project to determine whether it could result in significant environmental impacts. The designation of a particular topic as "Potentially Significant" in the Initial Study means that the EIR will consider the topic in greater depth and determine whether the impact would be significant. The proposed project could have a significant effect on transportation and traffic-related air quality because the project would increase traffic and transit use in the area. In addition, the proposed project would involve the construction of 84-foot-tall buildings on the project site, and thus could have significant aesthetic and shadow impacts. The proposed excavation beneath the project site would occur in an area of known archaeological resources, with the resulting potential for significant cultural resources impacts. These potential transportation, traffic, air quality, visual quality, shadow, and archaeological impacts will be analyzed in the EIR. The EIR will provide discussion of other topics, such as land use, which are determined in this Initial Study not to be significant, but would be included in the EIR for informational purposes.

2. Effects Found Not to be Significant

The following potential individual and cumulative environmental effects of the proposed project were determined either to be less than significant or to be reduced to a less-than-significant level through recommended mitigation measures included in this Initial Study:

- Land Use (all topics, but will be discussed in the EIR for informational purposes);
- Aesthetics (light and glare);
- Population and Housing (all topics);
- Cultural and Paleontological Resources (historical architectural resources, unique paleontological or geologic resources);
- Transportation and Circulation (air traffic patterns, emergency access);

- Noise (all topics);
- Air Quality (construction dust and exhaust emissions, odors, toxic air contaminants, exposure to diesel particulates, climate change);
- Wind;
- Recreation (all topics);
- Utilities and Service Systems (all topics);
- Public Services (all topics);
- Biological Resources (all topics);
- Geology And Soils (all topics);
- Hydrology and Water Quality (all topics);
- Hazards/Hazardous Materials (all topics);
- Minerals/Energy Resources (all topics); and
- Agricultural Resources (all topics).

These items are discussed with recommended mitigation measures, where appropriate, in Sections E and F, and require no further environmental analysis in the EIR. All mitigation measures identified, including those for construction noise, construction air quality, biological resources (nesting birds), and hazards/hazardous materials (methane and vapor intrusion), have been agreed to by the project sponsor and will be incorporated into the proposed project. For items designated "Not Applicable," the conclusions regarding potential significant environmental effects are based upon field observations, staff and consultant experience and expertise on similar projects and/or standard reference materials available within the Planning Department, such as the California Natural Diversity Database and maps published by the California Department of Fish and Game. For each checklist item, the evaluation has considered both individual and cumulative impacts of the proposed project. As indicated above, the EIR will discuss land use for informational purposes, although this Initial Study determined that such effects resulting from the proposed project would not be significant.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
1. **LAND USE AND LAND USE PLANNING— Would the project:**					
a) Physically divide an established community?	☐	☐	☒	☐	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐	☐
c) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☒	☐	☐

Question 1a: As noted in Section B, Project Setting, p. 29, the project site is located along The Embarcadero in downtown San Francisco. Adjacent uses include the residential communities of Golden Gateway Center and Golden Gateway Commons, public open space and other public uses, and the offices, restaurants, retail uses, and open space at Piers 1, 1-1/2, 3 and 5. In the greater project vicinity, the high-rise Embarcadero Center office and commercial development is about a block to the south and southwest, the Ferry Building is about a block to the southeast, and Pier 7 is about one-half block to the northeast.

The project site is occupied by the Golden Gateway Tennis & Swim Club and a public parking lot. The health club is a private club, open to dues-paying members. The parking lot is primarily used to serve visitors to the Ferry Building.

The proposed project would result in the temporary removal of the existing health club and public parking facilities on the project site, and the development of the site with residential, retail, restaurant, and health club uses and public parking. Six of the existing tennis courts would be replaced on the project site; three of the courts would be removed permanently. Both of the swimming pools would be replaced on the project site. The tennis courts and pools would reopen after construction of the north parking garage.

The project would not permanently displace the health club or its users. Site construction could cause temporary disruption to site neighbors and health club users in the form of environmental effects such as noise and dust during construction. These effects are discussed in other sections of this Initial Study.

The proposed development would be incorporated into the established street plan and would create no impediment to the passage of people or vehicles. The project would be constructed entirely within the boundaries of the existing project site, and would not displace or substantially alter off-site uses. For those reasons, the project would not physically divide an established community.

Question 1b: The City's *General Plan*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The proposed project would not obviously or substantially conflict with any such policy. As part of its decision to approve, modify or disapprove the project, the Planning Commission will consider other potential conflicts with the *General Plan* and will weigh *General Plan* policies and decide whether, on balance, the project is consistent with the *General Plan*.

The *Golden Gateway Redevelopment Plan*, which provides proposals, regulations and controls, and provisions to effect redevelopment, does not contain policies that directly address physical environmental issues. However, the removal of the blighted conditions that were present in the Golden Gateway Redevelopment Project Area – the original intent of the *Redevelopment Plan* – is relevant to the physical environment. The proposed project would not obviously or substantially conflict with the *Redevelopment Plan*. At the time of project approval, if parts of the project site (Assessor's Block 171/Lot 69 and/or Assessor's Block 168/Lot 58) remain within the jurisdiction of the Redevelopment Agency, the Redevelopment Agency Commission would make findings of consistency of the proposed subsurface north parking garage with the *Redevelopment Plan* or delegate its authority to the Planning Commission.

Environmental plans and policies are those, like the *Bay Area Air Quality Plan*, that directly address physical environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy. Nevertheless, project consistency with environmental plans and policies will be discussed in the EIR.

The Priority Policies established by Proposition M, and the sections of this Environmental Evaluation addressing the associated environmental issues, are listed in the discussion of Compatibility with Existing Zoning and Plans, earlier in this Initial Study. The Priority Policies, which provide general policies and objectives to guide certain land use decisions, contain some policies that relate to physical environmental issues. The project would not obviously or substantially conflict with any such policy. As part of its decision to approve, modify or disapprove the project, the Planning Commission will consider other potential conflicts with the Priority Policies and will weigh the Priority Policies and decide whether, on balance, the project is consistent with the Priority Policies.

Question 1c: The relatively small buildings, paved tennis courts and parking, and landscaping on the project site currently serve as a transition between the dense downtown high-rise core to the south, mixed high-rise and lower-scale residential areas to the west and northwest, and the San Francisco Bay to the east. The area of the project site can be characterized by high-density residential buildings, a variety of retail uses that draw visitors from outside the neighborhood, several open spaces, and a heavily used transportation corridor.

The proposed project would result in the introduction of residential, retail, and restaurant uses to the site. The project could also intensify the existing recreational uses on the site by relocating the existing health club facility from Golden Gateway Center to the proposed building. The character of the project site would change from smaller-scale recreation and parking uses to more built-up, higher-intensity, primarily residential use. The changes in character would be limited mainly to the southern part of the site.

The project would result in a reduction of the number of tennis courts on the site, from nine to six. The tennis courts are privately operated and are accessible only to health club members. Therefore, the project would not result in a reduction of publicly owned recreation space. (The potential indirect effects on public tennis court use are discussed under Section E.9, Recreation, p. 65.) In addition, the project would provide shared open space open to the public, in the form of The Common, a landscaped area at the northern end of the project site, and part of the courtyard fronting Washington Street at the southern end of the project site.

The proposed project may be perceived negatively by existing residents in the project vicinity who have become accustomed to the existing private recreational facilities on the project site. Nevertheless, the proposed project's impacts on the character of the area would be less than significant under CEQA. The project would not introduce a new or incompatible land use to the area. Rather, it would extend the established residential and retail character of the area one block to the east along Washington Street. The nature and intensity of the proposed land uses would be consistent with, and less dense than, the character of development that exists in the area. In addition, private recreational facilities would be retained on the project site, and the character of the northern part of the project site would not change.

Based on the discussion above, the proposed project would not result in any significant land use impacts. However, land use will be discussed in the EIR for informational purposes.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☒	☐	☐	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	☒	☐	☐	☐	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☒	☐	☐	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	☐	☐	☒	☐	☐

Question 2a: Public areas in the vicinity of the project site consist of surrounding public streets and sidewalks, including Drumm Street, Washington Street, and The Embarcadero, as well as the Block 202 and Block 203 open spaces across Washington Street from the project site and Justin Herman Plaza further to the south. Despite the proximity of these areas to San Francisco Bay, public scenic views from these areas of the Bay and the East Bay hills beyond are almost entirely obstructed by the visual barrier created by the two-story bulkhead buildings at Piers 1 through 5, because the topography of the area is relatively flat.

The project site is a part of the view corridor along The Embarcadero, looking north and south. The pier bulkhead buildings, Ferry Building, public open space areas, partial water views, and views of the Bay Bridge along this corridor contribute to its scenic quality. Views toward the City from The Embarcadero are dominated by the high-rise buildings west and south of the project site.

Public rights-of-way on Telegraph Hill afford panoramic views of the Bay, Bay Bridge, and East Bay hills beyond, over the rooftops of waterfront development. The project site is visible in the distance from public rights-of-way on Telegraph Hill looking southeast, over the rooftops of the Golden Gateway Commons development.

The proposed buildings would not obstruct public scenic views of the Bay that are not already obstructed by the Piers 1, 1-1/2, 3 and 5 buildings. In addition, views of the Bay, Bay Bridge and East Bay hills from public areas on Telegraph Hill would remain unobstructed. The proposed buildings would be a prominent feature in some views along The Embarcadero, but would not obstruct the corridor or affect views of the pier bulkhead buildings or Ferry Building. However, the potential impacts of the project on scenic vistas will be analyzed in the EIR.

The proposed project would affect private views toward the southeast, east, and northeast from several residential buildings in the project vicinity, and would be visible in the views from several other buildings. Although some reduced private views would be an unavoidable consequence of the proposed project and would be an undesirable change for those individuals affected, the change in views would not exceed that commonly expected in an urban setting. However, the potential impacts of the project on private views will be discussed in the EIR for informational purposes.

Question 2b: Scenic resources on the project site and in the vicinity include the public walkway within the access easement along the western site boundary, the parkland on Blocks 202 and 203 to the south and southwest, the pier bulkhead buildings across The Embarcadero to the east, and the San Francisco Bay. These resources would not be directly affected by the project because proposed development would be limited to the project site. (Indirect effects, such as changes to shadows and scenic views, are addressed in other parts of this Initial Study.)

Trees line the boundaries of the project site and are present within the site. The project would involve the removal of the trees on the site and within the public right-of-way to make way for the proposed development. Some of the trees are considered "significant" as defined in the Urban Forestry Ordinance (Article 16 of the Public Works Code). (See Section E.12, Biological Resources, of this Initial Study, for further discussion.) The project sponsor would comply with the requirements of the Ordinance, including requirements for the replacement of significant trees and street trees. However, project impacts on trees from a visual quality perspective will be addressed in the EIR.

Question 2c: Design and aesthetics are, by definition, subjective and open to interpretation by decision-makers and members of the public. A proposed project would therefore be considered to have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change. The project would change the visual character of the southern portion of the project site, from low-scale recreational uses and a surface parking lot to eight-story residential and commercial buildings. The EIR will address the potential effects of the project on the visual character of the project site and its surroundings.

Question 2d: Current sources of light on the project site include lighting within the parking lot on Seawall Lot 351 and within the Golden Gateway Tennis & Swim Club, in particular for the tennis courts. The lighting for the tennis courts is directed downward, and the fence that surrounds the health club largely contains the light and glare from the club. Vehicles parking at the project site and along roads in the project vicinity may be existing sources of glare. Existing lighting in the project site vicinity includes street lighting along The Embarcadero, Washington Street, Drumm Street, and Jackson Street, and lighting within and on the outsides of buildings.

The proposed project would result in the removal of three of the illuminated tennis courts and the development of two primarily residential buildings. The proposed buildings would include lighting on the exterior and within common and private spaces inside the building. The lighting would be typical of multi-unit residential and mixed-use buildings in the project vicinity. Lighting for the structured parking would not be visible from off site because the structured parking would be entirely below ground. The six new tennis courts proposed for the northern portion of the project site would continue to be screened by new fencing and new trees and landscaping. Therefore, the project would not cause substantial light or glare which would adversely affect day or nighttime views of the area. The topic of additional lighting will not be discussed further in the EIR.

Vehicles traveling to and from the project site would use the proposed structured parking and (while parked) would not be visible from off site. The proposed residential buildings would include transparent rather than reflective glass, in conformance with Planning Commission Resolution 9212. Therefore, the proposed project would not generate obtrusive glare that would adversely affect daytime or nighttime views in the area, and the topic of glare will not be discussed further in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
3. POPULATION AND HOUSING— Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐	☐
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐	☐

Question 3a: Based on a projected average household size for San Francisco of 2.28 persons per unit in 2010,[20] the addition of 170 residential units would increase the population on the site by

approximately 388 people. In the context of the projected increase in population city-wide of about 27,800 people between 2005 and 2015,[21] the increase resulting from the proposed project would not be substantial. The environmental impacts of the increased population are addressed in other sections of this Initial Study. The project would not induce additional population growth indirectly because it would not involve expansion of the capacity of area roads, utilities, or other infrastructure.

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[20] Persons per household for San Francisco from Association of Bay Area Governments, *Projections 2005*. The project site is in Census Tract 105, which had an average household size of 1.45 persons in 2000. The ABAG data were used because they are more conservative.

The project would result in an increase in business activity in downtown San Francisco. Overall, employment on the project site is expected to increase, as the project would include retail and restaurant uses. There would be an estimated 57 employees for the proposed restaurant and bar and retail uses, in addition to a small number of employees for management of the proposed garage and residential uses.[22] Overall, the proposed development would be expected to add a total of approximately 70 employees to San Francisco's economy. (As discussed under Question 3c below, total athletic club employment would not change substantially.)

San Francisco's employment is projected to increase from about 575,800 employees in 2005 to about 624,050 in 2010, an increase of about 8 percent.[23] The increase of up to 70 employees as a result of the project would represent about 0.1 percent of the City's estimated employment growth by the year 2010, even if all of the employees were conservatively assumed to be new to San Francisco. This potential increase in employment would be negligible in the context of total employment in greater San Francisco. Therefore, the project would not induce substantial growth or concentration of employment that would cause a substantial adverse physical change to the environment, and this topic will not be discussed further in the EIR.

Question 3b: The project would not displace housing because there are no residential units on the site. The increase in employment on the project site would result in an increase in the demand for housing. An estimated 338,700 households resided in San Francisco in 2005. By 2010, the number of households is expected to increase to about 345,830, or by about 2 percent.[24] Based on assumptions about commute patterns and household size, the project would generate a demand for about 28 new dwelling units in San Francisco.[25] These new households would represent about 0.4 percent of the City's estimated household growth by the year 2010. This potential increase in housing would be insubstantial in the context of total households in San Francisco. Further, the project sponsor would construct 34 units of affordable housing off site in accordance with *Planning Code* Section 315, in addition to the 170 units proposed on site. Analysis of housing displacement and demand will not be discussed further in the EIR.

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[21] Estimated 2005 population for San Francisco was 798,000 persons; projected population for 2015 is 825,800 persons. From ABAG *Projections 2005*.

[22] Retail employment density estimated at 350 sq. ft. per employee, based on San Francisco Planning Department, *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002, p. C-3.

[23] ABAG *Projections 2005*.

[24] ABAG *Projections 2005*.

Housing demand in and of itself is not a physical environmental effect; an imbalance between local employment and housing can lead to long commutes with associated traffic and air quality impacts. Traffic issues are discussed under Section E.5 on p. 52, and air quality issues are discussed under Section E.7 on p. 58.

Question 3c: Although the existing tennis courts and pools and the public parking lot would be removed, new tennis courts, pools, and public parking would be constructed and the health club would resume operations on the site. Therefore, the project would not displace a large number of employees.

Existing employment at the Golden Gateway Tennis & Swim Club (including the facility across Drumm Street in the Golden Gateway Center) consists of about 26 full-time employees and about 74 part-time employees. After project completion, the Golden Gateway Tennis & Swim Club would retain most of the employees currently on site and would transfer the existing health club employees across the street to the new facility in the proposed building. The composition of the staff would likely change to reflect the consolidation of facilities, larger fitness facilities, and reduction in tennis courts; front desk and tennis pro staff would decrease, and fitness department staff would increase.[26] However, total athletic club employment would not change substantially. Most of the athletic club employees would not be new to the City or even the project vicinity, and therefore would not require additional housing in San Francisco. The number of employees displaced would be small.

The parking lot on Seawall Lot 351 employs one person.[27] The parking lot and its employee would be displaced by the proposed project, but a public garage would be constructed that would provide employment opportunities for an estimated three to four people. Therefore, the project would not displace a substantial number of parking lot employees.

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[25] This method multiplies the estimated project-related employment (70 employees) by the proportion of jobs in San Francisco held by people who live in the City (55 percent). This result, the approximate number of project-related employees who would live in the City (39), is divided by the projected number of workers per household in San Francisco (1.4). The estimated housing demand would be 28 units. Based on San Francisco Planning Department, Housing Element, Tables I-14, I-15.

[26] Gerber, Jim, President, Western Athletic Clubs, written communication, August 9, 2007.

[27] Diohep, Kathleen, Port of San Francisco, personal communication, February 14, 2007.

The Golden Gateway Tennis & Swim Club currently has about 1,665 memberships (about 2,260 individuals). Of these, about 987 are swim memberships with fitness privileges, and about 678 are tennis memberships. The tennis memberships would be discontinued during project construction; after the tennis courts reopen, the athletic club plans to accept tennis memberships at the current ratio of members to courts (a reduction to about 450 memberships). Swim/fitness memberships might increase due to the larger fitness facilities, but would not change substantially, because the size of the swim facilities and number of pools would not change.[28] After completion of the project, visitors to the existing health club across Drumm Street would travel to the project site instead. This relocation of the health club to the project site from across the street, along with reconfiguration of the tennis and swim facilities, could result in new daily visitors to the project site. Visitation in the area to the athletic club would be similar to existing levels, and would not constitute a significant displacement of people.

For the above reasons, the project would not displace substantial numbers of people, nor require the construction of replacement housing elsewhere, and no further discussion in the EIR is required.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
4. **CULTURAL AND PALEONTOLOGICAL RESOURCES— Would the project:**					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	☐	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐	☐

Questions 4a–4d: The project site contains no buildings included in, or determined eligible for inclusion in, any federal, State, or adopted local register of historic resources (including *Planning Code* Articles 10 and 11), pursuant to CEQA Guidelines, Section 15064.5(a)(1) and (2). In

addition, there is no evidence that any building on the project site is an historic architectural resource pursuant to CEQA Guidelines, Section 15064.5(a)(3). In the vicinity of the project site, Piers 1, 1-1/2, 3, and 5, across The Embarcadero to the east of the project site, are within the Central Embarcadero Piers Historic District and the Embarcadero Historic District, which are listed on the National Register of Historic Places. Pier 1 is listed on the National Register individually.[29] The project would not result in any substantial adverse change in the significance of these historic resources nor conflict with the preservation of buildings subject to *Planning Code* Articles 10 or 11. For those reasons, impacts to historic architectural resources will not be discussed further in the EIR.

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[28] Gerber, Jim, President, Western Athletic Clubs, written communication, August 9, 2007.

There is a high potential for encountering subsurface cultural resources from the Gold Rush era (1849-1857) and other significant 19th century cultural resources within the project site. These resources could include Gold Rush-era ship remains; segments of the Jackson and Pacific wharves; a portion of the Old Seawall, which was constructed from 1867 to 1869 and has been determined eligible for listing in the National Register; and architectural and cultural remains associated with mid 19th century to early 20th century buildings and their occupants. Several previous programs of archaeological research in the immediate vicinity of the project site have encountered significant deposits of historic period cultural resources.

Given the likelihood of encountering significant subsurface cultural resources within the project site, the project could have a significant adverse impact on significant archaeological resources. This topic will be addressed in the EIR.

The project site is completely developed with recreational facilities and is in a highly urban area. Therefore, the project would not affect any unique geologic features, and the EIR will not address this topic. The project site is underlain by approximately 20 to 31 feet of fill, with Bay Mud beneath the fill to depths of 114 feet below the ground surface. The project would involve limited disturbance of the underlying bedrock. For that reason, and given that few prior excavations in San Francisco have unearthed significant paleontological resources, it is unlikely that the project would disturb any unique paleontological resources. The EIR will not address this topic.

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[29] National Register of Historic Places, www.nr.nps.gov (NRIS Database), accessed August 31, 2006. The historic district was listed in November 2002 and Pier 1 was listed in 1999.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
5. **TRANSPORTATION AND CIRCULATION— Would the project:**					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	☒	☐	☐	☐	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?	☒	☐	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☒	☐	☐	☐	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐	☐
f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?	☒	☐	☐	☐	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	☒	☐	☐	☐	☐

Questions 5a–5b: The residents of and visitors to the project site and employees of the proposed buildings and supporting uses would place increased demands on the local transportation system, including increased traffic, transit demand, and parking demand. The EIR will discuss project effects related to transportation and circulation, including impacts on intersection operations, transit demand, and impacts on pedestrian circulation, parking, bicycles, and freight loading, as well as construction impacts.

Question 5c: The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, this topic is not applicable to the proposed project.

Question 5d: The project would include access points to the parking garage from Washington Street and The Embarcadero. See the response to Question 5a. The EIR will address this topic.

Question 5e: The project would include two points of access to the site. Therefore, there would be no impacts on emergency access as a result of the proposed project, and the EIR will not address this topic.

Question 5f: See the response to Question 5a. The EIR will address this topic.

Question 5g: See the response to Question 5a. The EIR will address this topic.

Topics:		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
6.	**NOISE—Would the project:**					
a)	Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b)	Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c)	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
d)	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
e)	For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒
f)	For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒
g)	Be substantially affected by existing noise levels?	☐	☐	☒	☐	☐

Question 6a–6d, 6g: The existing background noise levels in the project area are typical of noise levels in urban San Francisco. The primary source of noise in the vicinity of the project site is

traffic. Noise modeling and measurements of locations in the project area indicate noise levels of 65 to 74 dBA, Ldn, with the highest noise levels along The Embarcadero.[30] [31]

Sensitive receptors near the project site include residents of the Golden Gateway residential buildings immediately west and northwest of the project site, and the users of Embarcadero Plaza I and II open space (Blocks 202 and 203), immediately south and southwest of the project site. Other sensitive receptors include Pier 7 and Justin Herman Plaza, each about one block from the project site.

Construction Noise

Construction and demolition activities proposed as part of the project would result in temporary on-site and off-site noise increases. Construction activities would include excavation and hauling, building erection, and finishing. Demolition and grading activities would involve the use of backhoes, tractors, scrapers, graders, and trucks. The use of explosives for demolition is not proposed.

On-site and off-site noise level increases due to construction and demolition activities would be temporary and intermittent and would occur at different times through the phases of project construction. The magnitude of the construction noise impact typically depends on the type of construction activity, the sound level generated by the various pieces of construction equipment in operation, the duration of the construction noise, the distance between the noise source and receptor, and the presence or absence of noise barriers.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dB(A) at a distance of 100 feet from the source. The ordinance does not regulate interior noise levels with respect to construction noise. Impact tools (e.g., jackhammers, pile drivers, and impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if the noise would exceed the ambient noise level by 5 dB(A) at the project property line, unless the Director of Public Works authorizes a special permit. Compliance with the Noise Ordinance is required by law and would reduce most project construction noise impacts to a less-than-significant level.

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[30] San Francisco Waterfront Land Use Plan EIR, pp. 196, 199; also *San Francisco General Plan*, Environmental Protection Element, Map 2, Thoroughfare Noise Levels, 1974. Also San Francisco Department of Public Health, Background Noise Map, 8 Washington and Vicinity, June 5, 2007.

[31] Noise is measured in decibels (dB). The A-weighted sound level or "noise level" is referenced in units of dB(A). It has been developed because the human ear does not respond uniformly to sounds at all frequencies A doubling of sound energy results in a 3.0 dB(A) increase in noise levels. A 5.0 dB(A) increase is readily noticeable to the human ear and the human ear perceives a 10.0 dB(A) increase in sound level to be a doubling of sound.

Foundation construction would involve pile driving. Pile driving would generate temporary noise and vibration that could be considered an annoyance to nearby residents in the Golden Gateway Center and Golden Gateway Commons, as well as to users of nearby open space and recreational facilities. Employees in and visitors to the Golden Gateway Center and Golden Gateway Commons may also find pile driving noise and vibration to be a nuisance. Pile driving could generate noise levels of about 90 dBA at a distance of 100 feet from the pile driver during impact. The nearest residences, those at the east end of the William Heath Davis Building, would be about 75 to 80 feet from the building site. Noise levels at receptors near the project site would depend on their distance from the pile driving equipment, and on the types of intervening structures. Intervening structures would reduce exterior noise levels by about 5 dBA, and interior noise levels with windows closed would be 15 to 20 dBA less than exterior noise levels. Pile driving would occur for approximately three to four months during construction.

To minimize the temporary construction noise from pile driving, the project sponsor would require construction contractors to predrill holes to the maximum depth feasible based on soil conditions. This feature of the project is included in Mitigation Measure Noise-1, p. 114, and would reduce the number of strikes of the pile driving hammer needed to drive each pile into its final position. The project sponsor would also require that the contractor limit pile driving activity to times of the day that would minimize disturbance to neighbors, consistent with the construction hours established in the Noise Ordinance, in consultation with the Director of Public Works. The project sponsor would also provide notice to building owners and occupants within 200 feet of the project site at least 48 hours prior to initiating pile driving activities, providing dates, hours and expected duration of pile driving, as included in the mitigation measure. Based on this mitigation measure, and given the short-term, temporary period of pile driving activity, pile driving noise would not be considered a significant environmental impact. Construction noise impacts will not be analyzed further in the EIR.

Traffic Noise

Traffic makes the greatest contribution to ambient noise levels in most of San Francisco. The proposed project would result in an increase in vehicle trips to the site, and could increase traffic noise levels in the project area. An approximate doubling of traffic volumes would be necessary to produce an increase in ambient noise levels noticeable to most people.

The project would add approximately 2,000 new vehicle trips per day to adjacent streets.[32] Based on the estimated daily traffic volumes on The Embarcadero and Washington Street near the project site, the project is not expected to result in a doubling of traffic volumes on those roads.[33] Therefore, the project would not cause traffic volumes to double at any study location, and it would not have a noticeable effect on ambient noise levels in the project vicinity. This topic will not be analyzed in the EIR.

Stationary Noise

The proposed project would include mechanical equipment, such heating, ventilation, and air conditioning (HVAC) units, that could produce operational noise. The equipment would be subject to the San Francisco Noise Ordinance, Article 29, Section 2909, which limits noise from building operations. The noise produced by the building HVAC equipment would depend on the unit size and design, but would typically not exceed 60 dBA (the limit set by the Noise Ordinance for the RC-4 District). Therefore, substantial increases in the ambient noise level due to building equipment noise would not be anticipated.

The proposed swimming pools and tennis courts would generate noise similar to that generated by the existing tennis and swim club facilities on the project site, and would not result in significant noise impacts. At the project location, operational noise would not be expected to be noticeable, given background noise levels of about 72 dBA Ldn in the area near Golden Gateway Center and The Embarcadero.[34]

The project would include two truck loading/unloading spaces for the new building, adjacent to the first-floor lobby, that would be accessed from Drumm Street. Some nearby noise-sensitive receptors (i.e., residents of the Golden Gateway Center to the west) could perceive noise from the loading and unloading activities at the new building. Typical noises would be associated with truck doors closing, hand trucks or dollies rolling up curbs or loading ramps, and truck engines starting. Loading and unloading would be expected to occur generally during daytime business hours. In the context of the relatively high existing traffic noise levels in the vicinity during the day, noise from loading and unloading activities would not be substantial, and would not represent a significant impact. Therefore, this topic will not be evaluated in the EIR.

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[32] Preliminary trip generation estimates provided by Adavant Consulting, March 2, 2007, include approximately 2,000 vehicle trips for the proposed residential and retail uses. The proposed public garage would affect the distribution of traffic but would not generate new vehicle trips.

[33] From traffic counts taken in 2006, average volumes on The Embarcadero adjacent to the project site are approximately 34,300 vehicles per day. From Farran, Jose, Adavant Consulting, written communication, March 21, 2007. Counts taken in 2000 on The Embarcadero indicate that more than 3,500 vehicles per day turn left from The Embarcadero onto Washington Street; the total vehicle count for Washington would be substantially higher than this number. Although these counts are several years old, they still provide a valid basis for analysis of the project's traffic noise impacts. From Department of Parking and Traffic counts, http://www.sfgov.org/site/frame.asp?u=http://www.sfmta.com, accessed March 7, 2007.

[34] San Francisco Planning Department, *Port of San Francisco Waterfront Land Use Plan FEIR*, Case No. 94.155E, State Clearinghouse No. 94123007, certified January 1997, p. 199. Ldn is the day-night average sound level averaged over a 24-hour period with greater weighting for nighttime noise.

Interior Noise

State regulations include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are collectively known as the California Noise Insulation Standards and are found in Title 24 of the California Code of Regulations. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior sources, the noise insulation standards set forth an interior standard of 45 dBA, Ldn in any habitable room and, where such units are proposed in areas subject to noise levels greater than 60 dBA, Ldn demonstrating how dwelling units have been designed to meet this interior standard. If the interior noise level depends upon windows being closed, the design for the structure must also specify a ventilation or air-conditioning system to provide a habitable interior environment.

The proposed project involves construction of a multi-family building, and thus would be subject to Title 24. Given the relatively high traffic noise levels along the adjacent roads, the proposed buildings will likely be required to incorporate additional attenuation features. Therefore, the project sponsor would implement Mitigation Measure Noise-2 (p. 114), which includes a detailed analysis of the noise reduction requirements for the project and the incorporation of the required features into the project design. In addition, the Department of Building Inspection would review the final building plans to ensure compliance with Title 24 noise standards. For those reasons, the impact of exterior noise levels on the proposed residences would not be significant with regard to Title 24, and this topic will not be analyzed in the EIR.

Questions 6e–6f: The project site is not located within two miles of any airport and would not expose people working or residing in the area to excessive noise levels. Therefore, this topic is not applicable and will not be analyzed in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
7. **AIR QUALITY** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. **Would the project:**					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐	☐

Questions 7a–7e: The proposed project is located within the San Francisco Bay Area Air Basin, which is within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Since most of San Francisco's topography is below 200 feet, marine air is able to flow easily across most of the City, making its climate cool and windy. Pollutant emissions in San Francisco are primarily from motor vehicle congestion. Localized pollutants, such as carbon monoxide from vehicles, can build up in "urban canyons," although the winds in San Francisco are generally strong enough to carry pollutants away from the area before they can accumulate. Prevailing winds in San Francisco are generally from the west and northwest.

Regulation of air pollution is achieved through both federal and State ambient air quality standards and limits for individual sources of air pollutants. An "ambient air quality standard" represents the level of air pollutant in the outdoor (ambient) air necessary to protect public health. As required by the federal Clean Air Act, the United States Environmental Protection Agency (U.S. EPA) has identified criteria pollutants and established National Ambient Air Quality Standards (NAAQS or federal standards) to protect the public health and welfare. NAAQS have been established for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter of less than 10 and 2.5 microns (PM_{10} and $PM_{2.5}$), and lead (Pb). The California Air Resources Board (CARB) has adopted more stringent ambient air quality standards (State standards) for most of the criteria pollutants.

Construction-Related Impacts

During project construction, the operation of equipment would emit hydrocarbons, oxides of nitrogen (NO_x), CO, inhalable particulate matter (PM_{10}) and fine particulate matter ($PM_{2.5}$). Soil movement for foundation excavation and site grading would create the potential for wind-blown dust to add to the particulate matter in the local atmosphere while open soil is exposed. Demolition, excavation, grading, foundation, and other ground-disturbing construction activity would affect localized air quality for up to about 11 months, causing a temporary increase in particulate dust and other pollutants. Sensitive receptors in proximity to the project site that could be affected by construction would include users of the public open space areas to the south and southwest of the project site.

The BAAQMD's approach to analysis of construction impacts is to emphasize implementation of effective and comprehensive control measures rather than detailed quantification of emissions.[35] In order to reduce the quantity of dust generated during site preparation and construction, the project sponsor has agreed to implement Mitigation Measure AQ-1 (identified on p. 114), incorporating the BAAQMD particulate control measures that are applicable to all construction sites. The project sponsor also has agreed to implement measures (included in AQ-1) to reduce construction exhaust emissions of PM_{10}. With implementation of these measures, the project would not have significant construction-related air quality impacts; this topic will not be discussed further in the EIR.

Operation-Related Impacts

The BAAQMD has established thresholds for projects requiring its review for potential air quality impacts. These thresholds are based on the minimum size of projects that the District considers capable of producing air quality problems due to vehicular emissions. The BAAQMD "generally does not recommend a detailed air quality analysis for projects generating less than 2,000 vehicle trips per day, unless warranted by the specific nature of the project or project setting."[36] The project would generate approximately 2,000 vehicle trips per day. Therefore, air quality impacts due to vehicular emissions will be addressed in the EIR.

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[35] BAAQMD, *CEQA Guidelines*, Assessing the Air Quality Impacts of Projects and Plans, December 1999, pp. 14, 32.

[36] BAAQMD, *CEQA Guidelines*, Assessing the Air Quality Impacts of Projects and Plans, December 1999, p. 24.

Odors and Toxic Air Emissions

In general, the proposed residential, restaurant, retail, health club, and supporting uses would not result in objectionable odors. Odors from the project (such as from vehicle operation or food preparation by residents) would be typical of those in the project area. Potential odors from food service facilities would be controlled in accordance with BAAQMD Regulation 7 for odorous emissions, and applicable requirements of the San Francisco Department of Public Health for proper kitchen filtration and food storage and disposal. Consequently, no significant impacts from odors are expected.

Toxic air pollutants are not expected to occur in any large amounts in conjunction with the operation of the project. The project would require the operation of heating and cooling equipment that could emit trace quantities of toxic air contaminants; these emissions would not be substantial. Common forms of hazardous or toxic materials typically used or stored in conjunction with residences, retail uses, and health club/spa facilities are expected to occur on the site.

In 1998, the CARB identified diesel particulate matter as a toxic air contaminant based on research indicating that long-term exposure to diesel particulate can increase a person's risk of developing cancer. Based on studies that show health risk from traffic-generated pollutants evident within 1,000 feet of major roadways (particularly for downwind receptors), and that exposure to traffic-generated pollutants is "greatly reduced at approximately 300 feet," the CARB's *Air Quality and Land Use Handbook* recommends that local agencies "avoid siting new sensitive land uses[37] within 500 feet of a freeway [or] urban roads with more than 100,000 vehicles/day…."[38] The proposed project would not be within 500 feet of a freeway or such high volumes of traffic.[39]

Given the above information, project impacts with respect to odors and toxic air contaminants will not be analyzed in the EIR.

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[37] ARB, *Air Quality and Land Use Handbook*, April 2005. Available on the internet at: http://www.arb.ca.gov/ch/handbook.pdf. The Handbook (p. 2) describes "sensitive land uses" as including residences, schools, day care centers, playgrounds, and medical facilities, as these uses are locations where "sensitive individuals" ["those segments of the population most susceptible to poor air quality (i.e., children, the elderly, and those with pre-existing serious health problems affected by air quality)"] are most likely to spend time.

[38] ARB, *Air Quality and Land Use Handbook*, April 2005, p. 4, Table 1-1.

[39] From traffic counts taken in 2006, average volumes on The Embarcadero adjacent to the project site are approximately 34,300 vehicles per day, substantially less than the threshold. From Farran, Jose, Adavant Consulting, written communication, March 21, 2007.

Greenhouse Gas Emissions

Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs). Both natural processes and human activities emit GHGs. The accumulation of GHGs in the atmosphere regulates the earth's temperature; however, emissions from human activities such as electricity production and vehicles have elevated the concentration of these gases in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to climate change.

The principal greenhouse gases are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. Of these gases, carbon dioxide (CO_2) and methane are emitted in the greatest quantities from human activities. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. There is international scientific consensus that human-caused increases in GHGs have contributed and will continue to contribute to global warming, although there is much uncertainty concerning the magnitude and rate of the warming.

Some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years.[40] There are also many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood, and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

California has taken a leadership role in addressing the trend of increasing GHG emissions, with the passage in 2006 of California Assembly Bill 32 (AB 32), the Global Warming Solutions Act. AB 32 requires the CARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution, committing the City and County of San Francisco to a GHG emissions reductions goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the San Francisco Public Utilities Commission published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse

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[40] California Air Resources Board (ARB) Climate Change website, (http://www.arb.ca.gov/cc/120106workshop/intropres12106.pdf), accessed March 24, 2007.

Emissions (Plan).[41] Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, it serves as a blueprint for GHG emission reductions, and several actions are now in progress. In addition, the City is already implementing a wide range of actions related to the reduction of GHG emissions.

Construction and operation of the proposed project would contribute to long-term increases in GHGs as a result of traffic increases (mobile sources) and residential and commercial building heating (area sources), as well as indirectly, through electricity generation. Direct project emissions of carbon dioxide, the primary greenhouse gas that would be emitted, would be an estimated 2,588 tons per year from mobile sources (vehicle travel) and 361 tons per year from area sources, for a total of 2,949 tons per year,[42] or approximately 0.04 percent of total San Francisco GHG emissions for the year 2002.[43]

The project's incremental increases in GHG emissions associated with project-generated traffic, residential and commercial space heating, and increased energy demand would contribute to regional and global increases in GHG emissions and associated climate change effects. Neither the BAAQMD nor any other agency has adopted significance criteria or methodologies for estimating a project's contribution of GHGs or evaluating its significance. However, the project would be located near multiple transit lines, which could help reduce transportation-related GHG emissions, relative to a project located elsewhere in the Bay Area, where transit service is generally less available than in the central City of San Francisco. In addition, GHG emissions increases from the project could be less than those that would result if this development occurred in outlying areas of the air basin, where trip lengths would be longer. Moreover, the project's location near a variety of commercial uses would be expected to make walking and other non-vehicular travel more viable than would be the case for a project in a lower-density, single-use neighborhood. The project would also be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, requirements of pertinent City ordinances such as the Residential Energy Conservation Ordinance, and emissions reduction actions included in the San Francisco Climate Action Plan, helping to reduce future energy demand as well as the project's contribution to regional GHG emissions. In addition, to meet LEED certification requirements the project would, at a minimum, implement building commissioning practices and design the buildings to meet established energy efficiency standards.[44]

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[41] San Francisco Department of the Environment and San Francisco Public Utilities Commission, *Climate Action Plan for San Francisco*, Local Actions to Reduce Greenhouse Emissions, September 2004.

[42] Estimate based on URBEMIS 2007 model, and does not subtract emissions from existing uses on the project site.

[43] Existing GHG emissions from BAAQMD, "Source Inventory of Bay Area Greenhouse Gas Emissions," November 2006.

For those reasons, the project would not conflict with the State's goals of reducing GHG emissions to 1990 levels by 2020, and the project's impact on GHG emissions would be less than significant. This topic will not be discussed further in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
8. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☒	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☒	☐	☐	☐	☐

Question 8a: Ground-level wind accelerations near buildings are controlled by exposure, massing, and orientation. Exposure is a measure of the extent that the building extends above surrounding structures into the wind stream. A building that is surrounded by taller structures is not likely to cause adverse wind accelerations at ground level, while even a small building can cause wind problems if it is freestanding and exposed.

Massing controls how much wind is intercepted by a structure and whether building-generated wind accelerations occur above ground or at ground level. In general, slab-shaped buildings have the greatest potential for wind problems. The more complex the building is geometrically, the lesser the probable wind impact at ground level.

Orientation also determines how much wind is intercepted by the structure. In general, a building oriented across the prevailing wind direction will have a greater impact on ground-level winds than a building oriented along the prevailing wind direction.

Prevailing winds in San Francisco are generally from the west and northwest. The project site is flanked on the south by parkland, and to the west and northwest by buildings ranging in height from 4 floors to 22 floors. High-rise buildings are located further south and west of the site. These structures shelter the project site from the prevailing winds. The sheltering effect is somewhat amplified by the terrain, which slopes up from the site to the west. As the San Francisco Bay is east of and near the project site, the site is exposed to winds from the north and east. However, the frequency of winds from those directions is low and winds from those directions tend to be light.

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[44] LEED prerequisites for energy include fundamental building systems commissioning, which involves verification that fundamental building elements and systems are designed, installed, and calibrated to operate as intended; and building design to meet established standards for energy performance.

An independent consultant studied the potential pedestrian-level wind impacts of the project. At 84 feet (8 stories) tall, the proposed buildings would be of modest height compared to nearby buildings, such as the Golden Gateway Center towers to the west (22 to 25 stories tall). The buildings would have a complex design with two irregularly-shaped eight-story towers separated by an interior courtyard; the towers would have setbacks at the seventh and eighth levels along the northern frontage, and at the eighth level along the eastern and western frontages. Therefore, the buildings would have little potential to cause substantial wind acceleration. Any wind accelerations generated by the structure would be moderate, infrequent, and localized, and would not extend into the park lands on Blocks 202 and 203 to the south. In addition, the proposed site is within a sheltering "wind shadow," as noted above.[45]

Overall, based on considerations of exposure, massing, and orientation, the project does not have the potential to cause significant changes to the wind environment in pedestrian areas adjacent to or near the site. This topic will not be analyzed in the EIR.

Question 8b: Section 295 of the City *Planning Code* was adopted in response to Proposition K (passed in November 1984) in order to protect public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year-round. Section 295 restricts new shadow upon public open spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant. The proposed residential buildings would be 84 feet tall, and thus could have shadow impacts. Therefore, this topic will be analyzed in the EIR.

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[45] Donald Ballanti, Certified Consulting Meteorologist, Wind Impact Evaluation for the Proposed 8 Washington Street Project, San Francisco, June 29, 2007. A copy of this document is available for review, by appointment, at the Planning Department, 1650 Mission Street, Suite 400, as part of the project file.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
9. RECREATION—Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐	☐
c) Physically degrade existing recreational resources?	☐	☐	☒	☐	☐

Questions 9a–9c: The San Francisco Recreation and Park Department administers more than 200 parks, playgrounds, and open spaces throughout the City. System recreation facilities also include 15 recreation centers, 9 swimming pools, 5 golf courses, and more than 300 athletic fields, tennis courts, and basketball courts.[46] Publicly accessible park and open space facilities near the project site include Assessor's Blocks 202 and 203, south and southwest of the project site across Washington Street; Justin Herman Plaza, located south of Clay Street along The Embarcadero (one block south of the project site); Sydney G. Walton Square (which is privately owned) on Jackson and Davis Streets one block northwest of the project site; the promenade along the east side of The Embarcadero; Pier 7, about one block north of the project site; and Alcoa Plaza, a podium-level open space within One Maritime Plaza (about one block west of the project site). Publicly accessible recreation facilities near the project site include Portsmouth Square at Washington Street and Walter Lum Place (about 0.6 mile west of the project site); Chinese Playground at Sacramento and Waverly Streets (about 0.8 mile southwest of the project site); Chinese Recreation Center at Washington and Mason Streets (about 1.0 mile west of the project site); Joe DiMaggio Playground at 651 Lombard Street (about 1.3 miles northwest of the project site); and North Beach Pool and Clubhouse at Lombard and Mason Streets (about 1.3 miles northwest of the project site). Combined, these locations offer a multi-use field, a swimming pool, and several recreation centers, basketball courts, and tennis courts.[47]

The Recreation and Open Space Element (ROSE) in the *San Francisco General Plan* notes that "While the number of neighborhood parks and facilities is impressive, they are not well distributed throughout the City…The [unequal distribution] merits correction where neighborhoods lacking parks and recreation facilities also have relatively high needs for such facilities." The ROSE defines "high need areas" as areas with high population density or high percentages of children, seniors, or low-income households relative to the City as a whole. The ROSE defines "deficient" areas as areas that are not served by public open space, areas with population that exceeds the capacity of the open spaces that serve it, or areas with facilities that do not correspond well to neighborhood needs.

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[46] San Francisco Recreation and Park Department, http://www.parks.sfgov.org/site/recpark_index.asp?id=24168, accessed January 11, 2007; San Francisco Recreation and Park Department, Recreation Assessment Report, August 2004, p. 21, at http://www.parks.sfgov.org/wcm_recpark/Notice/SFRP_Summary_Report.pdf, accessed January 25, 2007.

[47] San Francisco Recreation and Park Department, Recreation Assessment 2004, Maps, at http://www.parks.sfgov.org/site/recpark_index.asp?id=27310, accessed July 12, 2007.

The high need areas and deficient areas are shown on Figures 3 through 8 and Map 9 of the ROSE, and are based on information from the 1980 U.S. Census. The figures show that the 8 Washington project site is not considered a "high need" area based on overall population density, household income, or density of children, and is considered to have a "moderate" density of seniors relative to the City as a whole. The figures also show the project site to be served by public open space. Draft updated versions of the maps reflecting 2000 U.S. Census data show that the project site is not considered "high need" according to any of the ROSE criteria, and that the project site is served by public open space.[48]

In August 2004, the San Francisco Recreation and Park Department published a Recreation Assessment Report that evaluates the recreation needs of San Francisco residents. Nine service area maps were developed for the Recreation Assessment Report. The service area maps were intended to help Recreation and Park Department staff and key leadership assess where services are offered, how equitable the service delivery is across the City, and how effective the service is as it applies to the demographics of the service area. The maps (which were developed based on population served rather than distance) show that the project site is not within the defined service areas for the existing ball fields, multi-use/soccer fields, recreation centers, pools, basketball courts, or tennis courts in the City. Compared to the standards recommended in the report, additional ball fields, multi-use/soccer fields, and outdoor basketball courts are needed for the City as a whole. The 2004 Recreation Assessment Report also identifies several areas of the City that are considered underserved by recreation facilities; these areas do not include the project site.[49]

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[48] San Francisco Department of Recreation and Parks, *Recreation and Park Acquisition Policy*, Second Public Draft, November 7, 2005, attached as Appendix C to the 2005 Capital Plan Update, http://parks.sfgov.org/site/capimp_index.asp?id=36403, accessed July 12, 2007.

[49] San Francisco Recreation and Park Department, Recreation Assessment 2004, pp. 20-23 and Maps, at http://www.parks.sfgov.org/site/recpark_index.asp?id=27310, accessed July 12, 2007.

The population accommodated by the project's 170 residential units would increase the demand for park and recreation facilities. However, the project's contribution to this need would not be considered a substantial addition to the existing demand for public recreation facilities in the area. The increase in demand would not be in excess of amounts expected and provided for in the project area and the City as a whole. The proposed project is within the service areas of several public parks and open spaces. Although the project is not within the defined service areas of the nearest public recreational facilities, these facilities can be easily accessed by transit from the project site. The additional use of these facilities would be relatively minor compared with the existing use of the facilities. The proposed project would provide about 15,000 sq. ft. of private open space and about 700 sq. ft. of common open space on site for project residents, exceeding the requirements of the *Planning Code.* The project would also provide about 14,400 sq. ft. of publicly accessible open space. In addition, privately operated outdoor athletic club facilities would be rebuilt on the project site and the associated indoor health club facilities would be relocated there.

During site preparation and construction of the north parking garage, the existing tennis courts and swimming pools would be removed from the site and would not be available to club members. However, this temporary impact on a private club would not be considered a significant environmental impact on recreational resources under CEQA.

The project would reduce the number of tennis courts at the health club from nine to six. The tennis memberships would be discontinued during project construction; after the tennis courts reopen, the athletic club plans to accept tennis memberships at the current ratio of members to courts (a reduction from about 678 to about 450 memberships). The existing nine tennis courts are busy for most of the day, and there are waiting lists for court use during early evening time slots.[50] Therefore, the reduction in tennis memberships could result in an increase in the use of public tennis courts in the City. However, the number of public tennis courts in the City is close to the recommended national guideline of 1 court per 5,000 people.[51] There are free, publicly available tennis courts nearby at the Chinese Playground (one court) and the North Beach Playground (three courts).[52] The relatively small number of additional tennis users would not increase the use of the existing tennis courts enough to cause or accelerate substantial deterioration of the facilities.

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[50] Skelton, Alan, Golden Gateway Tennis & Swim Club, written communication, February 26, 2007.

[51] San Francisco Recreation and Park Department, Recreation Assessment Report, August 2004, pp. 21-23, at http://www.parks.sfgov.org/wcm_recpark/Notice/SFRP_Summary_Report.pdf, accessed January 25, 2007.

[52] San Francisco Recreation and Park Department, "Your Guide to Tennis Courts in San Francisco," http://www.parks.sfgov.org/site/uploadedfiles/recpark/Recreation_Programs/Tennis/tennis.pdf, accessed July 25, 2006.

The project would result in a change in use for part of the site from private recreation facilities to residential and retail/restaurant uses. The project also would result in an overall net decrease in recreation facilities of approximately 6,400 square feet. The removal of the three tennis courts would result in a net reduction of about 19,300 square feet of tennis court space. Therefore, the project would likely be subject to Board of Supervisors Resolution No. 723-06, which requires Conditional Use authorization for a change of use or reduction in size of any recreational space of 15,000 square feet or more.

The controls imposed by the resolution "attempt to preserve the character and quality of our neighborhoods and protect our parks and open space from development." The project would provide new recreational space, in the form of six tennis courts, two outdoor pools, and a 12,000-gsf indoor health club facility to replace the 7,355-gsf facility in the Golden Gateway Center. The project also would provide an 8,700-sq.-ft. public open space corridor north of the proposed buildings, and about 5,700 sq. ft. of public open space in areas at the north and south ends of the project site; the project site does not provide public open space at the present time. However, the project would not provide a complete in-kind replacement of the recreational space lost. The need for a Conditional Use authorization is not itself a significant environmental impact under CEQA, and the physical impacts related to the loss of the tennis courts would be less than significant (as noted above). The Conditional Use authorization will be discussed in the Land Use section of the EIR.

The proposed project would provide open spaces on site for project residents and health club facilities; the impacts of those spaces are addressed elsewhere in the Initial Study, as part of the analysis of the project as a whole.

For the reasons noted above, the project would not have any significant impacts on park or recreational facilities, and this topic will not be analyzed in the EIR.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
10. UTILITIES AND SERVICE SYSTEMS—Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒	☐

The project site and vicinity are currently served by public utilities and service systems, including provision of water, wastewater collection and treatment, and solid waste collection and disposal. The proposed project would increase the intensity of development on the site and consequently increase demand for and use of public utilities on the site.

Question 10a: The project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board. Existing wastewater and stormwater from the project site are collected for treatment and disposal at the Southeast Water Pollution Control Plant (Southeast Plant). (The combined wastewater and stormwater system is discussed under Questions 10b through 10e below.) The volume of wastewater from the site would increase as a result of the project, but not enough to affect the volume or frequency of combined sewer overflow, and the nature of the wastewater on the site would be typical of residential, retail, and recreational uses. In addition, the proposed project includes features to reduce the amount of stormwater runoff leaving the site; these features would also help to offset the increase in wastewater flows. Therefore, the proposed project would not result in any exceedances of treatment requirements established in the National Pollutant Discharge Elimination System permit issued to the SFPUC by the Regional Water Quality Control Board, San Francisco Bay Region. This topic will not be analyzed in the EIR.

Questions 10b–10e: The following discussion addresses potential impacts related to water and wastewater services and systems.

Water

The SFPUC provides water (through retail and wholesale customers) to approximately 2.4 million people in San Francisco, Santa Clara, Alameda, San Mateo, and Tuolumne Counties.[53] Approximately 96 percent of the water provided to San Francisco is supplied by the SFPUC Regional Water System, which is made up of water from the Hetch Hetchy Reservoir and Bay Area reservoirs in the Alameda and Peninsula watersheds.[54]

Citywide water use in 2000 was approximately 84 million gallons per day (mgd), of which about 57 percent was for residential customers and about 34 percent for business. Most of the remaining 9 percent was considered "unaccounted" water.[55] Water demand in San Francisco is expected to decrease slightly between 2000 and 2030, in spite of a projected increase in the City's population. Lower water use rates are expected because of an anticipated decrease in the number of people in each housing unit and the increased use of water-efficient plumbing fixtures.[56]

Total system-wide demand is projected to increase to 300 mgd by 2030. The City's *2005 Urban Water Management Plan* (UWMP) projects that, during normal precipitation years, the SFPUC will have adequate supplies to meet the projected demand. During multiple dry years, however, additional water sources will be required.[57] To address this issue, the SFPUC has embarked on a multi-year program, called the Water System Improvement Program (WSIP), to rebuild the water system.[58] A revised WSIP was issued in January 2006 and is undergoing environmental review.[59] [60] The SFPUC also is developing an *Integrated Water Resource Plan*, a planning document detailing how long-term water demand can be met through a mix of water supply options (such as groundwater, recycled water, conservation, and imported water).

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[53] SFPUC, *2005 Urban Water Management Plan for the City and County of San Francisco*, adopted December 13, 2005, p. 5.

[54] SFPUC, *Urban Water Management Plan*, p. 9. Groundwater and recycled water make up the remainder of the SFPUC supplies to the City.

[55] Unaccounted for water includes necessary but unmetered uses such as fire fighting, main flushing, and storage facility cleaning, as well as losses due to leaking pipes.

[56] SFPUC, *Urban Water Management Plan*, pp. 42-43.

[57] SFPUC, *Urban Water Management Plan*, p. 47.

[58] SFPUC, "Notice of Changes to Water System Improvement Program AB 1823 (March 8, 2006)," available at http://sfwater.org/detail.cfm/MC_ID/13/MSC_ID/167/C_ID/3007, accessed January 11, 2007.

The proposed project would result in an increase in water use at the project site. Estimated "baseline" water demand (water use without conservation measures) from the project is approximately 13.0 million gallons per year. The project sponsor intends to include high-efficiency water fixtures (e.g., faucets, toilets, and showerheads) to obtain LEED credits for water use; the use of low-flow fixtures would reduce project water consumption by approximately 26 percent.[61]

Given the relatively small size of the project and the sponsor's intent to incorporate high-efficiency fixtures, the project would not require a major expansion of the SFPUC's water facilities, nor would it adversely affect the City's water supply. The population growth accommodated by the project would be within the projections used as the basis for demand estimates in the *Urban Water Management Plan*. In addition, the SFPUC has adopted a long-term water management plan and is undertaking a number of efforts to meet projected system-wide demand and ensure the reliability of the system's water supply. For that reason, project and cumulative impacts on water supply would be less than significant.

Wastewater

Stormwater from the project site flows to the City's combined stormwater and wastewater system. The project site is served by the Southeast Water Pollution Control Plant, which treats all east side sewage flows during dry weather. During wet weather, the Southeast Plant is supplemented by the North Point Wet Weather Facility and a series of storage and transport boxes. When wet-weather flows exceed the capacity of the overall system, the excess is discharged from 29 combined sewer overflow (CSO) structures located along the waterfront. All discharges are operated in compliance with permits issued by the Regional Water Quality Control Board and with the U.S. EPA's Combined Sewer Overflow Control Policy.

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[59] SFPUC, "Water System Improvement Program (January 2006)," available at http://sfwater.org/detail.cfm/MC_ID/13/MSC_ID/167/C_ID/3007, accessed January 11, 2007.

[60] SFPUC, "Program Environmental Impact Report," available at http://sfwater.org/mto_main.cfm/MC_ID/13/MSC_ID/167/MTO_ID/374, accessed January 11, 2007.

[61] Water demand and conservation estimates from Guttmann & Blaevoet Consulting Engineers, August 2007, based on assumed mix of residential units.

In 2004, the SFPUC Water Pollution Control Division began the development of a new *Sewer System Master Plan* to develop a comprehensive long-term vision and strategy for the management of the City's wastewater and stormwater. The plan will guide development and implementation of a 30-year wastewater capital improvement program.[62] In addition to addressing the quantity and frequency of sewage overflows during major rainstorms, the plan will address aging infrastructure, flooding in neighborhoods, disposal of biosolids (treated solid waste), potential future changes in water quality regulations, odors from the wastewater system and facilities, and neighborhood concerns about the Southeast Plant. The *Master Plan,* which will undergo separate CEQA review, is expected to be completed in 2008. In 2005, the SFPUC launched a citywide $150 million 5-Year Wastewater Capital Improvement Program to improve the reliability and efficiency of the combined system.

Section 14, Hydrology and Water Quality, p. 87, addresses the potential for the increase in the volume of CSO discharges to degrade water quality, in the context of the City's compliance with existing regulatory requirements and ongoing planning efforts.

In light of the above, impacts related to water and wastewater would be less than significant, and will not be discussed in the EIR.

Question 10f–10g: According to the California State Integrated Waste Management Act of 1989, San Francisco is required to adopt an integrated waste management plan, implement a program to reduce the amount of waste disposed, and have its waste diversion performance periodically reviewed by the Integrated Waste Management Board. Reports filed by the San Francisco Department of the Environment showed the City generated 1.88 million tons of waste material in 2002. Approximately 63 percent (1.18 million tons) was diverted through recycling, composting, reuse, and other efforts while 700,000 tons went into landfill. The diversion percentage increased from 52 percent reported in 2001.[63]

Solid waste generated in San Francisco is transported to, and disposed of at, the Altamont Landfill in Alameda County. The Altamont Landfill has a permitted maximum disposal of 6,000 tons per day and received about 1.34 million tons of waste in 2002 (the most recent year reported by the State). The total permitted capacity of the landfill is more than 124 million cubic yards; with this capacity, the landfill can operate until 2025.[64] Although the increased residential population and commercial activity resulting from the project would incrementally increase total waste generation from the City, the increasing rate of diversion through recycling and other methods would result in a decreasing share of total waste that requires deposition in the landfill. Given this, and given the long-term capacity available at the Altamont Landfill, the project would not result in this or any other landfill exceeding its permitted capacity, and the project would result in a less-than-significant impact. For these reasons, solid waste will not be discussed in the EIR.

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[62] http://sfwater.org/msc_main.cfm/MC_ID/14/MSC_ID/120, accessed on March 6, 2007.

[63] City and County of San Francisco, Office of the Controller, Community Indicators Report, http://www.sfgov.org/wcm_controller/community_indicators/physicalenvironment/recycling/recycling.htm accessed January 17, 2007.

[64] California Integrated Waste Management Board, Active Landfill Profiles, Altamont Landfill, http://www.ciwmb.ca.gov/Profiles/Facility/Landfill/LFProfile1.asp?COID=3&FACID=01-AA-0009, accessed January 17, 2007.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
11. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	☐	☐	☒	☐	☐

The project site and vicinity are currently served by public services, including fire suppression and emergency medical services, police protection, public schools, and recreational facilities. The proposed project would increase the intensity of development on the site and consequently increase the demand for and use of public services on the site. The following discussion addresses potential impacts on fire and police protection and schools. Impacts to recreation are discussed under Section E.9 on p. 65.

Fire Protection

The San Francisco Fire Department (SFFD), headquartered at 698 Second Street, provides fire suppression and emergency medical services to the City and County of San Francisco, including the project site. The SFFD consists of 3 divisions, which are further divided into 10 battalions and 42 active stations located throughout the City. The closest fire station to the project site is Station 13, at 530 Sansome Street, about 0.4 mile from the project site. Other fire stations in the vicinity include Station 35, at Pier 22-1/2 (0.7 mile away), and Station 2, at 1340 Powell Street

(0.9 mile away).[65] All three stations have engine companies; Stations 2 and 13 also have truck companies; and Station 35 has a fire boat unit.[66]

The SFFD provides unified emergency medical services (EMS) in the City, including basic life support (BLS) and advanced life support (ALS) services. In addition, several privately operated ambulance companies are authorized to provide BLS and ALS services.[67] The Fire Department currently has about 18 ambulances and firefighter/paramedic and firefighter/emergency medical technicians (EMT) on staff.[68] In 2005, the San Francisco Fire Commission authorized a reconfiguration of EMS in the City over a period of three years, including the hiring and training of paramedic and EMT personnel, among other changes.[69]

The proposed project would result in an increase in the number of fire suppression and emergency medical service calls received from the project area. The increase would be incremental, funded largely through project-related increases to the City's tax base, and would not likely be substantial in light of the existing demand and capacity for fire suppression and emergency medical services in the City. The proposed project would not require the construction of new or physically altered facilities or significantly increased staff. Furthermore, in November 2005, San Francisco voters passed a measure to prevent the closure of any existing fire stations.[70] Therefore, the project would not be expected to have any substantial impact on fire services, and fire and emergency medical services will not be discussed in the EIR.

Police Protection

The San Francisco Police Department (SFPD), headquartered at 850 Bryant Street, provides police protection for the City and County of San Francisco including the project site. The SFPD consists of four Bureaus and ten Districts located throughout the City. The Central Police Station at 766 Vallejo Street has jurisdiction over the project site and vicinity.[71]

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[65] San Francisco Fire Department, http://www.sfgov.org/site/fire_index.asp?id=4455, accessed July 25, 2006; distances calculated with www.mapquest.com.

[66] As of 2004. From Office of the Controller, City and County of San Francisco, "A Review of the San Francisco Fire-EMS System," p. 5, April 2004, http://www.sfgov.org/site/controller_page.asp?id=24430, accessed July 25, 2006.

[67] San Francisco Emergency Medical Services Agency, http://www.sanfranciscoems.org/ (EMS System Providers), accessed May 24, 2006.

[68] San Francisco Fire Department, http://www.sfgov.org/site/fire_index.asp?id=4455, accessed May 24, 2006.

[69] San Francisco Fire Commission, Resolution 05-4, EMS Reconfiguration, adopted March 24, 2005, from http://www.sfgov.org/site/firecomm_page.asp?id=33532, accessed May 24, 2006.

[70] San Francisco Chronicle, "SAN FRANCISCO MEASURES: Voters take stand against guns, recruiting at schools," November 9, 2005, www.sfgate.com, accessed May 24, 2006.

The increased population accommodated by the proposed project would result in an increase in the number of service calls handled by the Police Department. However, this increase in responsibilities would not likely be substantial in light of the existing demand and capacity for police protection services in the area. The proposed project would not increase demand in excess of amounts provided for in the project area and would not require the construction of any new police facilities. The project therefore would not be expected to adversely affect the ability of the Police Department to adequately provide police protection services to the project area and to the City as a whole. Thus, this impact would be less than significant, and police services will not be discussed in the EIR.

Schools

The project site is within the attendance districts for John Yehal Chin Elementary School at 350 Broadway, Francisco Middle School at 2190 Powell Street, and the Galileo Academy of Science & Technology at 1150 Francisco Street. However, the San Francisco Unified School District (SFUSD) has a "choice-based" enrollment system, whereby parents submit an application with a list of school choices and the District assigns students based on available openings, attendance areas, and a lottery process.[72] For that reason, the following discussion focuses on conditions in the District as a whole.

Student enrollment in the SFUSD has been decreasing steadily for more than ten years. During the 2005-2006 academic year, total enrollment was 56,236, a decline of about 9.7 percent from the 62,300 students enrolled during the 1994-95 academic year.[73] Private school enrollment has also been decreasing, with student enrollment almost 8 percent less for the 2004-05 academic year than student enrollment for the 1999-2000 academic year.

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[71] San Francisco Police Department, http://www.sfgov.org/site/police_index.asp?id=19970, accessed July 25, 2006.

[72] San Francisco Unified School District, http://portal.sfusd.edu/ (Interactive Map; Departments/ Educational Placement Center/ Enrollment for 2006-2007 School Year/ Assignment Process), accessed May 25, 2006.

[73] San Francisco Unified School District, http://portal.sfusd.edu/template/default.cfm? (About SFUSD/ Statistics), accessed May 25, 2006.

To estimate the number of students generated by new housing development for planning purposes, the SFUSD employs a student generation rate of 0.125 students per new unit of multi-family housing.[74] Based on this factor, the proposed project would generate about 21 students.

The Leroy F. Greene School Facilities Act of 1998, or Senate Bill 50 (SB 50), restricts the ability of local agencies, such as the City and County of San Francisco, to deny land use approvals on the basis that public school facilities are inadequate. The payment of development impact fees is intended to compensate for potential impacts to local school districts that may be attributed to new developments. Development impact fees are based on the type of land use and its size, rather than the anticipated number of new students that may be generated. The current SFUSD fees (among others) are $2.24 per square foot of residential development and $0.18 per square foot of retail development.[75]

Local jurisdictions are precluded under State law (SB 50) from imposing school-enrollment–related mitigation beyond the school development fees. The collection of these fees, therefore, is considered under SB 50 to fully mitigate any potential effects associated with additional development that could result from implementation of the proposed project, and the project impact would be considered less than significant. Impacts on schools will not be discussed further in the EIR.

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[74] Smith, Philip, Director, Real Estate, San Francisco Unified School District, email communication with Turnstone Consulting, May 25, 2006.

[75] Ibid.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
12. BIOLOGICAL RESOURCES— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

Questions 12a–12d: The project site is developed with tennis courts, buildings, parking lots, and other surfaces. An arborist surveyed and assessed the trees on the project site.[76] Approximately 163 trees representing 17 species are present within the project site and along the adjacent public rights-of-way: 86 trees representing 12 species are within the project site and 77 trees are along the sidewalks and walkways.

The trees within the project site generally line the tennis courts and pool area; there is also a group of trees at the northern end of the site, and trees on the site but outside of the perimeter fence for the club. A group of 14 London Plane trees separates four of the tennis courts at the southern end of the project site; 6 African Fern Pines and 2 London Plane trees are present between two of the tennis courts and the pool area; and 10 African Fern Pines and 4 Mexican Fan Palms line the north and west ends of the pool area. Two Dracaena trees are just north of the basketball court. On the northern end of the project site are 18 trees of various species and heights, including 9 Monterey Pines. Outside of the club fence are 12 London Plane trees along the eastern fence line facing the parking lot, 2 Monterey Pines at the corner of Washington and Drumm Streets, 5 Ornamental Fig trees along Jackson Street (at the terminus of Drumm Street), and 10 Red Ironbark trees along the eastern side of the Drumm Street pathway. In addition, a Monterey Pine is present near the entrance to the public parking lot along Washington Street.

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[76] Batchelder, Stephen, Consulting Arborist, *Preliminary Tree Survey Report, 8 Washington St., San Francisco, CA,* October 12, 2006. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of the project file.

The sidewalks adjacent to the project site are planted with 32 London Plane trees along The Embarcadero, 10 Brazilian Pepper trees along Drumm Street, and 8 Ornamental Fig trees along Washington Street (50 street trees total). Other trees that could be affected by the project include 6 Ornamental Fig Trees in the Washington Street median and 21 trees representing 8 species along the west side of the Drumm Street pathway.

Generally the trees on the project site and the adjacent street trees are in fair to poor condition.[77] The condition of the trees is attributed to inappropriate species for the site conditions, limitations of the site soil volumes, and past pruning practices.

The project site also includes several landscaped areas with turf grass and shrubs. The vicinity of the project site is completely urbanized.

The project would include development of the southern part of the site with residential and retail/restaurant uses, and development of the northern part of the site with recreational facilities. Up to 136 trees would be removed as part of the project. These trees are not considered rare or endangered; the trees are not part of any native habitat on the site. Given these facts and the conditions present on the project site and in the area, the project would not affect a rare or endangered plant or animal species or its habitat, riparian habitat or sensitive natural communities, or wetlands.

Bird nests could be present in the trees on the site at times. Federal requirements in the Migratory Bird Treaty Act (16 U.S.C. Section 703) protect nesting birds, and the project sponsor would be subject to those requirements. The project sponsor has agreed to incorporate Mitigation Measure Bio-1 (p. 115) to determine whether active nests are present prior to removal of the trees, and to provide for protection of any active nests present at the time tree removal is proposed. With implementation of this measure, the project would not interfere substantially with wildlife movement or impede the use of nursery sites.

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[77] Batchelder, Stephen, Consulting Arborist, *Preliminary Tree Survey Report, 8 Washington St., San Francisco, CA,* October 12, 2006, pp. 2-5.

Question 12e: Article 16 of the San Francisco Public Works Code, the Urban Forestry Ordinance, provides for the protection of "landmark" trees, "significant" trees, and street trees. Landmark trees are designated by the Board of Supervisors upon the recommendation of the Urban Forestry Council, which determines whether a nominated tree meets the qualifications for landmark designation by using established criteria (Section 810). Special permits are required to remove a landmark tree on private property or on City-owned property.

Significant trees are those trees within the jurisdiction of the Department of Public Works, or trees on private property within 10 feet of the public right-of-way, that meet certain size criteria. To be considered significant, a tree must have a diameter at breast height of more than 12 inches, a height of more than 20 feet, or a canopy of more than 15 feet (Section 810A(a)). The removal of significant trees on privately owned property is subject to the requirements for the removal of street trees (discussed in the following paragraph). As part of the determination to authorize removal of a significant tree, the Director of the Department of Public Works is required to consider certain factors related to the tree, including (among others) its size, age, species, and visual, cultural, and ecological characteristics (Section 810A(c)).

The removal of "street trees" (trees within the public right-of-way or on land within the jurisdiction of the Department of Public Works) by abutting property owners requires a permit under Article 16 of the San Francisco Public Works Code. If the Department grants a permit, it shall require that replacement trees be planted (at a one-to-one ratio) or that an in-lieu fee be paid (Section 806(b)).

There are no landmark trees within the project site or within the adjacent public right-of-way.[78] Of the 86 trees within the project site, 36 trees have been identified as "significant" per the Public Works Code, and 39 of the 77 trees within the adjacent public right-of-way meet the size criteria for significance. The project would result in the removal of all 86 trees within the project site and 50 trees within the adjacent public right-of-way.

Prior to tree removal, the project sponsor would apply to the Department of Public Works for a tree removal permit, and the sponsor would comply with all requirements of the Urban Forestry Ordinance (including requirements for tree replacement or in-lieu fees). The project would include the planting of trees within the project site and along the adjacent sidewalks. The sponsor has indicated that new trees would be planted in at least a 1:1 ratio to replace those removed. Therefore, the project would not conflict with any local policies or ordinances protecting trees. For the reasons noted in the response to Questions 12a-12d, the project would not conflict with any local policies or ordinances protecting other biological resources.

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[78] D'Agostino, Maria, San Francisco Urban Forestry Division, personal communication, January 2, 2007.

Question 12f: There are no adopted habitat conservation plans that include the project site or vicinity. Therefore, this topic is not applicable.

The proposed project would not have any significant impacts on biological resources, and this topic will not be discussed further in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
13. GEOLOGY AND SOILS—Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☐	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐

The project sponsor has provided a preliminary geotechnical study, prepared by a California-licensed geotechnical engineer, to address geotechnical issues regarding development of the project site.[79] This study provides the basis for the analysis of potential geologic impacts of the project. The study concludes that the proposed project is feasible from a geotechnical standpoint, and that the primary geotechnical concerns for the site are the presence of liquefiable soil and soft and weak compressible clays of the Bay Mud, proper foundation support, and the selection of a rigid shoring system. These issues are summarized below, along with methods recommended in the study to avoid adverse geotechnical effects; the methods identified would be incorporated into the project. The sponsor has agreed to follow the recommendations of the report in constructing the project and a detailed geotechnical investigation would be conducted to develop specific design criteria for the project prior to development of final project plans.

The final building plans would be reviewed by the Department of Building Inspection (DBI). In reviewing building plans, the DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of areas of special geologic concern. The above-referenced detailed geotechnical investigation would be available for use by the DBI during its review of building permits for the site. Also, DBI could require that additional site-specific soils report(s) be prepared in conjunction with permit applications, as needed. Therefore, potential damage to structures from geologic hazards on the project site would be less than significant, as discussed below, through the DBI requirement for a geotechnical report and review of the building permit application pursuant to its implementation of the Building Code.

Question 13a: The 8 Washington Street site is located on land reclaimed from San Francisco Bay. Reclamation began during the 1850s as the Bay was progressively filled. Borings drilled at the site and in the vicinity indicate the presence of fill, Bay Mud, the Posey Formation, Old Bay Clay, the Alameda Formation, and bedrock beneath the project site. The fill extends to depths of between 20 and 31 feet, and directly under the fill layer is a layer of soft silts and clays, locally known as Bay Mud, to depths of between 108 and 114 feet below the ground surface. The three geologic units beneath the Bay Mud are comprised of undifferentiated sands with clay lenses (Posey Formation), clays and clays with sand (Old Bay Clay), and colluvial clays and sands (Alameda Formation). The bedrock underlying these units is known as the Franciscan Complex, and consists of highly sheared and altered shale with zones of sandstone and intrusions of serpentine. The bedrock is between 130 and 200 feet deep, and slopes downward toward the southeast.

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[79] Treadwell & Rollo, *Preliminary Geotechnical Study, 8 Washington Street, San Francisco, California,* August 21, 2006. This report is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, and is available for public review, by appointment, as part of the project file.

The fill was most likely derived from Dune sand and rubble placed as part of the land reclamation in the mid to late 1800s as well as rubble from the post 1906 earthquake leveling process, and consists of loose to dense sandy materials containing rubble such as brick, concrete fragments, and wood. It may also contain cobbles and boulders. Portions of two seawalls, constructed between 1867 and 1889 and subsequently filled over, could also be located under part of the project site.[80] Therefore, it is clear that the fill layer beneath the project site contains multiple materials of varying strengths, depths, and consistencies.

The ground surface at the project site is relatively level, gently sloping toward the Bay. Groundwater has been observed at depths of approximately 7 to 12 feet below the ground surface.[81] Groundwater levels at the site likely fluctuate with the tides due to the project site's proximity to the Bay.

Fault Rupture

The project site is not located within an Alquist-Priolo Earthquake Fault Zone as defined by the California Department of Conservation Division of Mines and Geology (CDMG), and no active or potentially active faults exist on or in the immediate vicinity of the site.[82] Therefore, the potential for surface fault rupture is low, and this impact is considered less than significant and will not be analyzed in the EIR.

Groundshaking

The USGS Working Group on California Earthquake Probabilities (WG02) concluded that there is a 62 percent probability of a strong earthquake (magnitude ≥ 6.7) occurring in the San Francisco Bay region in a 30-year period between 2003 and 2032.[83] The faults nearest the project site are the San Andreas fault, located within 9 miles; the Hayward fault, located within 9 miles; the San Gregorio fault, located within 12 miles; the Calaveras fault, located within 21 miles; and the Rodgers Creek fault, located within 20 miles. Based on shaking hazard mapping done by the Association of Bay Area Governments (ABAG), it is expected that the project site would experience violent ground shaking due to an earthquake along the peninsula segment of the San

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[80] Archeo-Tec, *Archaeological Research Design / Treatment Plan for the 8 Washington Street Project*, February 11, 2003.

[81] Treadwell & Rollo, Phase I and Limited Phase II Environmental Site Assessment, 8 Washington Street (370 Drumm Street), San Francisco, California, February 13, 2006.

[82] California Geological Survey, Table 4, Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of May 1, 1999, from http://www.conservation.ca.gov/cgs/rghm/ap/affected.htm, accessed July 24, 2006.

[83] U.S. Geological Survey (USGS), Earthquake Probabilities in the San Francisco Bay Region, by Working Group on California Earthquake Probabilities: 2002–2031, USGS Open-File Report 03-214, 2003.

Andreas fault, and very strong ground shaking due to an earthquake along the northern Hayward fault,[84] which are the faults closest to the project site.

Although the project site would be subject to very strong to violent ground shaking in the event of a major earthquake, the project would not expose people or structures to substantial adverse effects related to ground shaking. The project would be designed and constructed in accordance with the 2002 San Francisco Building Code, which incorporates California Building Code requirements that specify definitions of seismic sources and the procedure used to calculate seismic forces on structures during groundshaking. During its review the DBI would determine necessary engineering and design features for the project to reduce potential damage to structures from groundshaking and to ensure compliance with all San Francisco Building Code provisions regarding structural safety. Therefore, impacts related to ground shaking are considered less than significant and will not be analyzed in the EIR.

Liquefaction, Lateral Spreading, and Seismically Induced Densification

Strong shaking during an earthquake can result in ground failure associated with soil liquefaction,[85] lateral spreading,[86] and seismically induced densification.[87] The project site is located in an area of liquefaction potential identified in the Community Safety Element of the *San Francisco General Plan* and by the California Division Department of Conservation under the Seismic Hazards Mapping Act of 1990.[88] Although the project site is underlain by loose and weak fill that could experience liquefaction-related settlement or lateral spreading, the fill that could liquefy would be removed during construction of the basement levels of the project and the buildings would be supported on driven piles supported in the stiff clays, dense sands, and bedrock that underlie the site, as recommended in the preliminary geotechnical report. Therefore, the potential for liquefaction-induced settlement and lateral spreading at the project site is low.

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[84] Association of Bay Area Governments, Hazard Maps, Shaking Maps, 2003, www.abag.ca.gov, accessed July 24, 2006.

[85] Liquefaction is a phenomenon in which saturated, cohesionless soil experiences a temporary loss of strength due to the buildup of excess pore water pressure, especially during cyclic loading such as that induced by earthquakes. Soil most susceptible to liquefaction is loose, clean, saturated, uniformly graded, fine-grained sand and silt of low plasticity that is relatively free of clay.

[86] Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. Upon reaching mobilization, the surficial blocks are transported downslope or in the direction of a free face by earthquake and gravitational forces.

[87] Seismically induced densification is a phenomenon in which non-saturated, cohesionless soil is compacted by earthquake vibrations, causing differential settlement.

[88] California Department of Conservation, State of California Seismic Hazard Zones, City and County of San Francisco Official Map, November 17, 2001.

Although the project site and vicinity are underlain by uncontrolled fill, geologic materials to the east of the project site consist of large rip-rap and boulders with sand and clay. The voids in these materials would likely prevent pore water pressure buildup. Although localized areas of liquefaction could occur in the site vicinity, pile-supported buildings such as those included in the project and the stability of the seawall would not be affected.

Regardless, the DBI would, in its review of the building permit application, require the project sponsor to prepare a geotechnical report pursuant to the State Seismic Hazards Mapping Act. The report would assess the nature and severity of the hazard(s) on the site and recommend project design and construction features that would reduce the hazards(s). During its review the DBI would determine necessary engineering and design features for the project to reduce potential damage to structures from liquefaction-induced settlement and lateral spreading and to ensure compliance with all San Francisco Building Code provisions regarding structural safety. Therefore, impacts related to liquefaction-induced settlement and lateral spreading are considered less than significant and will not be discussed in the EIR.

Earthquake-Induced Landslides

There is no impact related to earthquake-induced landslides because the project site is located in a flat area that is not an area of mapped landslide susceptibility identified in the Community Safety Element of the *San Francisco General Plan* or by the California Department of Conservation under the Seismic Hazards Mapping Act of 1990. This topic will not be analyzed in the EIR.

Question 13b: Soil movement for foundation excavation could create the potential for wind- and water-borne soil erosion. The site is relatively flat; therefore, substantial erosion and loss of soil would not be expected to occur during site preparation and construction. Furthermore, the project sponsor would be required to prepare an erosion and sediment control plan for construction activities in accordance with Article 4.1 of the San Francisco Public Works Code to reduce the impact of runoff from the construction site. The City must review and approve the erosion and sediment control plan prior to implementation, and would conduct periodic inspections to ensure compliance with the plan. (See Section E.14, Hydrology and Water Quality, for a discussion of water quality effects of erosion and sedimentation during construction.) Therefore, impacts related to soil erosion and the loss of top soil are considered less than significant and this topic will not be analyzed in the EIR.

Question 13c: Ground settlement could result from excavation to a depth of as much as 38-40 feet for construction of up to three levels of subsurface parking, from construction dewatering, and from heave during installation of piles as described below. Long-term dewatering would not be required because the underground structure would be waterproofed and constructed to withstand hydrostatic pressure of the groundwater.[89] Therefore, the effects of long-term dewatering do not need to be discussed further.

Excavation

During excavation for subsurface parking, the fill and Bay Mud beneath the project site, described in the response to Question 13a, could become unstable. The preliminary geotechnical report includes recommendations for excavation and shoring to prevent this soil from becoming unstable, including the use of rigid and water-tight internally braced secant walling as shoring. An inclinometer monitoring system is recommended to monitor for movement at the face of the excavation, and a monitoring program, including a baseline survey and frequent surveying of the excavation as construction progresses, is recommended to evaluate the effects of construction.

Dewatering

Groundwater is relatively shallow throughout the site. The site is near San Francisco Bay, and gravel and loose rubble have been found in the fill. Therefore, there is the potential for substantial water inflow into the excavation. Although the shoring system used during excavation would be water-tight, dewatering of excavations for installation of utilities and compaction of soil could be required. The geotechnical study[90] recommends that any excavation below the water table should be relatively water tight, and that a site-specific dewatering plan should be prepared. The final building plans would be reviewed by the DBI, which would determine if additional site-specific reports would be required.

Heave as a Result of Pile Driving

Driving of displacement piles may cause the ground to heave up to several inches, and the heave could adversely affect adjacent structures. The geotechnical study[91] recommends a preconstruction survey and monitoring during pile driving to monitor these effects. The final building plans would be reviewed by the DBI, which would determine if a preconstruction survey and subsequent monitoring would be required.

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[89] Palley, Chuck, President, Cahill Contractors, Inc., email communication with Simon Snellgrove and Elliott Grimshaw, February 16, 2007.

[90] Treadwell & Rollo, *Preliminary Geotechnical Study, 8 Washington Street, San Francisco, California,* August 21, 2006. The project sponsor has agreed to follow the recommendations in the report.

[91] Ibid.

DBI Requirements

The DBI would require that the detailed geotechnical report address the potential settlement and subsidence impacts of excavation, dewatering, and pile driving. The DBI would also require that the report include a determination as to whether a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, the Department of Public Works would require that a Special Inspector be retained by the project sponsor to perform this monitoring. Groundwater observation wells could be required to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge or other corrective actions would be used to halt this settlement. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor.

With implementation of the recommendations of the detailed geotechnical study, subject to review and approval by the DBI, and monitoring by a DBI Special Inspector (if required), impacts related to the potential for settlement and subsidence due to construction on soil that is unstable, or could become unstable as a result of the project, are less than significant and will not be discussed in the EIR.

Question 13d: The presence of expansive soils is not an issue for the project because the fill immediately beneath the site is sandy and would not be expansive and the Bay Mud beneath the project site is below the groundwater table, and thus is permanently saturated. Therefore, impacts related to expansive soils are considered less than significant and this topic will not be analyzed in the EIR.

Question 13e: The new buildings would connect to existing wastewater conveyance, treatment, and disposal facilities and would not use septic tanks or other on-site land disposal systems. Therefore, impacts related to having soils capable of supporting the use of septic tanks or alternative waste disposal systems do not apply to this project and this topic will not be analyzed in the EIR.

Question 13f: The project site is flat and completely developed with tennis courts, swimming pools, and a surface parking lot. Therefore, there is no impact related to the potential for the project to substantially change site topography or affect any unique geologic or physical site features. This topic will not be analyzed in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
14. HYDROLOGY AND WATER QUALITY—Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	☐	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☐	☒
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐	☐

Question 14a: Implementation of the proposed project would result in wastewater and stormwater discharges once the project is constructed, as well as groundwater produced during construction dewatering. These discharges would be conducted in accordance with applicable regulations, and implementation of required permit conditions and control measures would not result in a violation of any water quality standards or waste discharge requirements, as discussed below.

Wastewater and Stormwater Discharges

Wastewater from the east side of the City, including the proposed project area, flows to the City's combined sewer system and is transported to the Southeast Water Pollution Control Plant. The Southeast Plant can treat up to 150 million gallons per day (mgd) of sewage to a secondary level,[92] and has a permitted dry weather capacity of 85 mgd. The annual average wastewater flow during dry weather is 67 mgd. Therefore, all dry weather wastewater flow, consisting mainly of municipal sanitary sewage and industrial wastewater, is treated to a secondary level at the Southeast Plant. The treated wastewater is then discharged to the Bay through the deep water outfall at Pier 80, located immediately north of the Islais Creek Channel.

During wet weather, stormwater flows from most of the City, including the project area, also drain to the combined sewer system, which collects large volumes of stormwater runoff in addition to municipal and industrial wastewater. The combined wastewater and stormwater flow is conveyed to various treatment facilities before eventual discharge to the Bay. Up to 150 mgd of wet weather flows receive secondary treatment at the Southeast Plant. The Southeast Plant can also treat up to an additional 100 mgd to a primary treatment[93] standard plus disinfection. Treated wet weather discharges from the Southeast Plant occur through the Pier 80 outfall directly to the Bay or through the Quint Street outfall to Islais Creek Channel (on the south bank of Islais Creek, one block west of the Third Street Bridge). Only wastewater treated to a secondary level is discharged at the Quint Street outfall.

Up to an additional 150 mgd of wet-weather flows receive primary treatment plus disinfection at the North Point Wet Weather Facility. Treated effluent from this facility is discharged through four deep water outfalls, approximately 800 feet from the Bay shoreline and 18 feet below mean lower low water. Two of the deep water outfalls terminate at the end of Pier 33 and two terminate at the end of Pier 35 on the northeastern Bay shoreline.

The combined sewer system includes storage and transport boxes that, during wet weather, retain the combined stormwater and sewage flows that exceed the capacities of the Southeast Plant and the North Point Wet Weather Facility; these flows are treated later when there is available capacity. When rainfall intensity results in combined flows that exceed the total capacity of the Southeast Plant, North Point Facility, and the storage and transport structures, the excess flows are discharged through 29 combined sewer discharge structures located along the City's Bayside waterfront from Fisherman's Wharf to Candlestick Point. Discharges from the structures, consisting of about 6 percent sewage and 94 percent stormwater, receive "flow-through treatment," which is similar to primary treatment, to remove settleable solids and floatable materials. Wet weather flows are intermittent throughout the rainy season, and combined sewer discharge events vary in nature and duration depending largely on the intensity of individual rainstorms.

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[92] Secondary treatment is the treatment of wastewater or sewage involving removal of organic matter using biological and chemical processes. This is a higher level of treatment than primary treatment, which is removal of floating and settleable solids using physical operations such as screening and sedimentation. Secondary treatment is less intensive than tertiary treatment, in which additional chemical and biological treatment processes are used to remove additional compounds that may be required for discharge or reuse purposes.

[93] Primary treatment refers to physical treatment processes, such as screening and sedimentation, which remove large and heavy solids.

When the capacity of the system is exceeded, wet weather flows in the project area can be discharged through six combined sewer discharge structures discharging to the Bay, north of Pier 1. These combined sewer discharge structures are operated under a permit issued by the California Regional Water Quality Control Board, San Francisco Bay Region (CRWQCB). The permit allows for a long-term average of four overflows per year. Historically, between 1989 and 2004, there was an average of three discharge events per year at these locations.[94]

All dry and wet weather discharges from the combined sewer system to the Bay, through either the outfalls or the combined sewer discharge structures, are operated in compliance with the federal Clean Water Act and the State's Porter-Cologne Water Quality Control Act through National Pollutant Discharge Elimination System (NPDES) Permit No. CA0037664 issued by the CRWQCB.[95] This permit prohibits overflows from the combined sewer discharge structures during dry weather, and requires wet-weather overflows to comply with the nine minimum controls specified in the federal Combined Sewer Overflow Control Policy. In compliance with this policy, the City has developed a Water Pollution Prevention Program that focuses on minimizing pollutants from entering the City's combined sewer system and addresses pollutants from residential, commercial, industrial, and nonpoint pollutant sources. The City has also developed a long-term control plan for combined sewer discharges to comply with water quality criteria and to protect the beneficial uses of the receiving waters.

The City is currently conducting ongoing planning efforts that address combined sewer discharges and associated water quality impacts and may directly or indirectly affect the proposed project. Two of these planning efforts are discussed below: the Sewer System Master Plan and New Development and Redevelopment Guidelines.

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[94] Brown and Caldwell, Screening of Feasible Technologies (SOFT) for Wastewater and Stormwater Management for San Francisco Bayside Watersheds, February 27, 2004, p. 3-10.

[95] California Regional Water Quality Control Board, San Francisco Bay Region, National Pollutant Discharge Elimination System (NPDES) Permit No. CA0037664, Order No.2002-0073, for City and County of San Francisco Southeast Water Pollution Control Plant, North Point Wet Weather Facility, and Bayside Wet Weather Facilities. Adopted June 19, 2002. Available at http://www.waterboards.ca.gov/sanfranciscobay/order_nosb2.htm.

Sewer System Master Plan. In 2004, the SFPUC Water Pollution Control Division began the development of a new *Sewer System Master Plan* to develop a comprehensive long-term vision and strategy for the management of the City's wastewater and stormwater. The plan will guide development and implementation of a 30-year wastewater capital improvement program.[96] In addition to addressing the quantity and frequency of sewage overflows during major rainstorms, the plan will address aging infrastructure, flooding in neighborhoods, disposal of biosolids (treated solid waste), potential future changes in water quality regulations, odors from the wastewater system and facilities, and neighborhood concerns about the Southeast Plant. The *Master Plan*, which will undergo separate CEQA review, is expected to be completed in 2008.

New Development and Redevelopment Guidelines. Impervious surfaces such as buildings, roads, and parking lots cover much of San Francisco, blocking infiltration of rainwater, contributing to the number and volume of combined sewer discharges during wet weather, and contributing pollutants to stormwater runoff to the combined sewer system. The SFPUC is actively pursuing ways to improve its wastewater treatment efficiency and drainage performance to enhance environmental quality, reduce pollutants discharged to the Bay and Ocean, and reduce impacts in San Francisco neighborhoods. As part of this effort, the SFPUC is developing a policy that would require new development and redevelopment projects in San Francisco to incorporate green stormwater management technologies (often called Best Management Practices or Low Impact Development approaches) to maximize infiltration and minimize pollutant loads in stormwater runoff.[97] Examples of the kinds of green stormwater management that can be implemented include swales and other infiltration methods, rainwater gardens, stormwater planters, green roofs, pervious concrete, green streets, creating open space, and reducing the use of pipes, curbs, and gutters. Implementation of these techniques helps reduce peak volumes of runoff entering the combined sewer system, reduces combined sewer discharge volumes, removes pollutants close to their source, uses rainwater as a resource, increases vegetation in the City, and provides educational opportunities.

Construction Dewatering Discharges

Groundwater produced during construction dewatering would be discharged to the combined sewer system in accordance with Article 4.1 of the San Francisco Public Works Code, as supplemented by Order No. 158170, which regulates the quantity and quality of discharges to the combined sewer system. This permit would contain appropriate discharge standards and may require installation of meters to measure the volume of the discharge. Although the groundwater could contain contaminants related to past site activities, as discussed in Section E.15, Hazards and Hazardous Materials, as well as sediment and suspended solids, the groundwater would be treated as necessary to meet permit requirements prior to discharge. Long-term dewatering would not be required because the underground structure would be waterproofed and constructed to withstand the hydrostatic pressure of the groundwater.

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[96] San Francisco Public Utilities Commission, http://sfwater.org/msc_main.cfm/MC_ID/14/MSC_ID/120, accessed on March 6, 2007.

[97] San Francisco Public Utilities Commission, http://sfwater.org/detail.cfm/MC_ID/14/MSC_ID/118/MTO_ID/230/C_ID/3150, accessed on March 6, 2007.

Conclusion

Because groundwater produced during construction dewatering and all wastewater and stormwater would be discharged to the combined sewer system in accordance with applicable regulations, and the combined flows would be treated and discharged in accordance with provisions of NPDES Permit No. CA0037664, impacts related to the potential to violate any water quality standards or waste discharge requirements would be less than significant and this topic will not be analyzed in the EIR.

Question 14b: The proposed project would not deplete groundwater supplies because, with the exception of temporary construction dewatering, the project would not include groundwater withdrawals. Although dewatering would be required during construction, any effects related to lowering the water table would be temporary and would not be expected to substantially deplete groundwater resources.

The proposed project would not interfere with groundwater recharge because there would be a 3.000-sq.-ft. decrease in impervious surfaces at grade, and creation of these pervious surfaces would allow for more recharge of the shallow groundwater system in the project vicinity relative to existing conditions. Therefore, impacts related to depletion of groundwater resources and interference with groundwater recharge would be less than significant and will not be analyzed in the EIR.

Questions 14c: There are no surface water channels on the project site. Therefore, the proposed project would not alter the course of a stream or river. Construction activities such as earthwork could lead to erosion where soil is exposed. In accordance with LEED guidelines for development of sustainable sites and Article 4.1 of the San Francisco Public Works Code, the project sponsor would prepare an erosion control plan specifying erosion control measures to prevent loss of soil during construction by stormwater runoff and/or wind erosion and to prevent sedimentation to the combined sewer system. The plan would be reviewed and approved by the City prior to construction, and the City would conduct periodic inspections to ensure compliance with the plan. With preparation and implementation of the erosion control plan, water quality impacts related to on- and off-site erosion and siltation would be less than significant and this topic will not be analyzed in the EIR.

Question 14d–14f: Changes in sanitary sewage flows and stormwater runoff as a result of project implementation could result in long-term changes to the wastewater flows to the City's combined sewer system, which could potentially contribute to an increase in combined sewer system discharges or flooding of the sewer system during wet weather. However, the project includes water conservation measures and stormwater controls that could decrease the rate and quantity of these discharges and improve their quality relative to existing conditions. Therefore, the project would not contribute to an increase in combined sewer discharges; increase on- or off-site flooding; contribute runoff water which would exceed the capacity of the combined sewer system; or provide a substantial source of polluted runoff, as discussed below.

Sanitary Sewage Flows

The project would include the construction of new residential, retail, and restaurant uses, increasing the site population by approximately 390 people as well as increasing the number of visitors to the site. However, the project would incorporate water use reduction strategies such as use of high-efficiency water fixtures in accordance with LEED guidelines for water efficiency. Implementation of these measures would reduce project water usage relative to the anticipated baseline conditions, with an associated reduction in wastewater production. Therefore, the project would not contribute to a substantial city-wide increase in wastewater production. Furthermore, the City is developing the *Sewer System Master Plan*, discussed above, which will include future measures by the City to reduce the quantity and frequency of combined sewer discharge events and to improve the water quality of combined sewer discharges.

Stormwater Flows

In accordance with LEED guidelines for development of sustainable sites, the project would include preparation of a stormwater management plan with controls to reduce stormwater runoff rates and quantity as well as the discharge of stormwater pollutants. LEED goals for stormwater management include 1) reducing the rate and quantity of runoff by 25 percent; and 2) removing 80 percent of the annual average post development total suspended solids and 40 percent of average annual post-development total phosphorous. Features planned as part of the project to meet these goals include:

- A reduction in impervious surfaces at grade of more than 25 percent (from about 120,200 sq. ft. to about 89,300 sq. ft.), and construction of a 30,000- sq.-ft. green roof (using local and drought-tolerant species) that would increase rainwater infiltration at the site;
- Incorporation of retention basins and bioswales in landscaped areas in order to decrease stormwater runoff from the site and provide treatment of stormwater runoff; and
- Replacement of more than 6,000 sq. ft. of outdoor parking with underground parking spaces, which would remove a source of potential stormwater pollutants including those from fluid leaks from vehicles, brake pad wear, tire abrasion, pavement wear, and atmospheric deposition.

In addition, the project would be required to comply with the existing Combined Sewer Overflow Control Policy and Water Pollution Prevention Programs, including implementation of pretreatment programs to ensure that combined sewer discharge events are minimized, as well as development and implementation of pollution prevention programs that focus on contaminant reduction in accordance with SFPUC's Water Pollution Prevention Program. Implementation of these measures would decrease the potential for violating discharge limits of the City's NPDES permits and would also decrease the City's reliance on treatment technologies as a means to reduce pollutant loads.[98] [99]

Although it has not been determined whether implementation of the proposed stormwater controls would achieve LEED sustainable site requirements for stormwater management,[100] implementation of these controls would nevertheless increase infiltration of rainwater, delay peak stormwater runoff flows, and provide a reduction of pollutants in the stormwater runoff and would likely comply with the New Development and Redevelopment Guidelines under development by the City (described above). With implementation of these controls and compliance with the Combined Sewer Overflow Control Policy and Water Pollution Prevention Program, potential effects of stormwater flows on the frequency of combined sewer discharges would be decreased, and this would be a beneficial impact of the project.

Conclusion

With implementation of LEED sustainable site and water efficiency measures, as well as compliance with regulatory requirements and guidelines for discharges to the combined sewer system discussed above, the project would not contribute to an increase in combined sewer discharges; increase on- or off-site flooding; contribute runoff water which would exceed the capacity of the combined sewer system; or provide a substantial source of polluted runoff. Therefore, these impacts are considered less than significant and will not be analyzed in the EIR.

Questions 14g–14h: The City of San Francisco does not currently participate in the National

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[98] San Francisco Public Utilities Commission, *Wastewater System Reliability Assessment, Baseline Facilities Report*, Draft, December 2003, prepared by SFPUC Water Pollution Control Division, San Francisco Department of Public Works, Bureau of Engineering, Hydraulic & Mechanical Sections, and The Water Infrastructure Partners.

[99] San Francisco Public Utilities Commission, *Water Pollution Prevention Program Progress Report, July 2003 to December 2003*, February 13, 2004.

[100] To obtain a credit for Stormwater Design: Quantity Control, the project must implement a stormwater management plan that results in a 25 percent decrease in the volume of stormwater runoff from the two-year 24-hour design storm. To obtain a credit for Stormwater Design: Quality Control, the project must implement a stormwater management plan that reduces impervious cover, promotes infiltration, and captures and treats the stormwater runoff from 90 percent of the average annual rainfall1 using acceptable best management practices. From LEED-NC Version 2.2, U.S. Green Building Council, https://www.usgbc.org/ShowFile.aspx?DocumentID=1095, accessed July 12, 2007.

Flood Insurance Program (NFIP) and no flood maps are published for the City. The Federal Emergency Management Agency (FEMA) is revising Flood Insurance Rate Maps (FIRMs), which support the NFIP, for San Francisco Bay Area communities. As part of this effort, FEMA plans to prepare a FIRM for the City and County of San Francisco for the first time. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco. The preliminary map is for review and comment only; FEMA anticipates that the final map will be published in September 2008.[101] FEMA has tentatively identified special flood hazard areas (SFHAs)[102] along the City's shoreline in and along the San Francisco Bay consisting of "A zones" (areas subject to inundation by tidal surge) and "V zones" (areas subject to the additional hazards that accompany wave action). According to the preliminary map, the 8 Washington/Seawall Lot 351 project site is not within an A zone or a V zone.[103] In addition, there are no natural waterways within or near the project site that could cause stream-related flooding. Therefore, no impacts related to placement of housing or other structures in a 100-year flood zone would occur, and this topic will not be analyzed in the EIR.

Question 14i: The project site is not located within an area that would be flooded as the result of failure of a levee or dam.[104] Therefore, no impact would occur, and this topic will not be analyzed in the EIR.

Question 14j: A tsunami is an advancing ocean wave originating from an earthquake epicenter. In San Francisco, the potential for damage due to direct wave action resulting from a tsunami would be expected to be limited to the coastline along the Pacific Ocean, including Ocean Beach between the Golden Gate Bridge and Fort Funston.[105] Because the advancing ocean wave would be restricted at the Golden Gate, damage due to direct wave action along the San Francisco Bay shoreline is not considered likely. However, the Bay shoreline between the Palace of Fine Arts and the Central Basin could be subjected to a seiche, or oscillation of the Bay water surface, as a result of a tsunami reaching the Golden Gate and damage could occur in inundated areas.

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[101] City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf, accessed November 12, 2007.

[102] A special flood hazard area is the flood plain that is at risk from the 100-year flood (a flood having a one-percent chance of occurrence in a given year).

[103] Federal Emergency Management Agency, Preliminary Flood Insurance Rate Map, City and County of San Francisco, California, Panel 120, September 21, 2007, available on the Internet at http://www.sfgov.org/site/uploadedimages/risk_management/j120A_jpg.jpg, accessed November 12, 2007.

[104] ABAG, http://www.abag.ca.gov/cgi-bin/pickdamx.pl, accessed July 25, 2006.

[105] City and County of San Francisco, *City and County of San Francisco Emergency Operations Plan*, January 2005.

The project site is located in an area identified for potential inundation in the event of a tsunami along the San Francisco coast, based on a 20-foot water level rise at the Golden Gate (Map 6 of the Community Safety Element of the *San Francisco General Plan*). Although extremely rare, a tsunami could cause damage to the proposed buildings and health club facilities. However, the proposed project would not substantially change or worsen this existing condition, and there is a well-established warning system in place that would provide early notification of an advancing tsunami and thus allow for evacuation of people. In addition, the relatively flat and developed area of the project site is not subject to mudflow. Therefore, impacts related to tsunami, seiche, and mudflow are considered less than significant and this topic will not be analyzed in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
15. HAZARDS AND HAZARDOUS MATERIALS Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	☐	☐	☒	☐	☐

Question 15a: During operation, the proposed retail uses and health club would require relatively small quantities of hazardous materials for routine business purposes. The project would likely result in the use of common types of hazardous materials such as paints, cleaners, toners, solvents, and disinfectants. In addition, the outdoor pools associated with the health club would require storage and use of sodium hypochlorite as a disinfectant, similar to existing conditions.[106]

The use and storage of these hazardous materials would comply with Article 21 of the San Francisco Health Code, which implements the hazardous materials requirements of the California Health and Safety Code and provides for safe handling of hazardous materials in the City. In accordance with this article, any person or business that handles, sells, stores, or otherwise uses hazardous materials in quantities exceeding specified threshold amounts would be required to obtain and keep a current hazardous materials certificate of registration and to implement a hazardous materials business plan (HMBP) submitted with the registration application.

In addition, transportation of hazardous materials is well regulated by the California Highway Patrol and the California Department of Transportation. With compliance with existing regulations, impacts related to the routine transport, use, and storage of hazardous materials would be less than significant and will not be analyzed in the EIR. The project would not involve the routine generation or disposal of hazardous wastes.

Question 15b: If hazardous materials are present in the soil or groundwater that would be disturbed during construction or in building materials that would be disturbed during demolition, the project could result in a release of hazardous materials, potentially affecting public health or the environment. In addition, methane or other flammable gases, if present, could potentially cause flammable or explosive conditions. The following discussion focuses on the potential for exposure to hazardous materials in soil, groundwater, or vapors beneath the project site, and in the existing buildings on the site.

Potential Impacts Related to Hazardous Materials in Soil or Groundwater

Project construction would include the excavation of soil for up to three levels of subsurface parking and the building foundation on the southern and central parts of the project site. Excavation would extend to as much as 38 feet below the ground surface beneath the building, about 14 to 22 feet beneath the north garage, and about 2 to 4 feet beneath the tennis courts on the northern part of the site. Proposed excavation would result in the removal of about 110,000 cubic yards of soil.

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[106] The Golden Gateway Tennis & Swim Club uses sodium hypochlorite (liquid chlorine) for sanitation in the existing swimming pools. The Club is registered with the City to store up to 342 gallons of liquid hazardous material. Stephens, Broc, Director of Operations, Golden Gateway Tennis & Swim Club, email communication, July 12, 2007.

The project site is located east of the original shore of San Francisco Bay. Therefore, it is within the defined limits of Article 22A of the San Francisco Health Code, formerly known as the Maher Ordinance, which applies to construction projects that are bayward of the historic high tide line and involve excavation of greater than 50 cubic yards of soil. Major requirements of this code, triggered by the building permit application, include preparation of a site history report to describe past site uses and identify whether the site is listed as a hazardous waste site pursuant to State or federal regulations; implementation of a soil investigation to evaluate the potential presence of hazardous wastes in the soil; and preparation of a soil analysis report that evaluates the results of chemical analysis of the soil samples. Article 22A requires that the report(s) are prepared by knowledgeable, certified professionals and provide information on historic and current contamination at the property. The soil analysis report is submitted to the San Francisco Department of Public Health (SFDPH), Department of Toxic Substances Control and the San Francisco Bay Region Regional Water Quality Control Board.

If required on the basis of the soil analysis report, a site mitigation plan must be prepared to 1) assess potential environmental and health and safety risks; 2) recommend cleanup levels and mitigation measures, if any are necessary, that would be protective of workers and visitors to the property; 3) recommend measures to mitigate the risks identified; 4) identify appropriate waste disposal and handling requirements; and 5) present criteria for on-site reuse of soil. The recommended measures would be completed during construction. Upon completion, a certification report is required stating that all mitigation measures recommended in the site mitigation report have been completed and that completion of the mitigation measures has been verified through follow-up soil sampling and analysis, if required.

If the approved site mitigation plan includes leaving hazardous materials in soil or the groundwater with containment measures such as landscaping or a cap to prevent exposure to hazardous materials, the SFDPH would require a risk management plan, health and safety plan, and possibly a cap maintenance plan specifying how unsafe exposure to hazardous materials left in place would be prevented, as well as safe procedures for handling hazardous materials should site disturbance be required. The SFDPH could require a deed notice, and the requirements of these plans would transfer to the new property owners in the event that the property was sold.

A Phase I and Limited Phase II Environmental Site Assessment was conducted for the project site in 2006 in conformance with the site history, soil investigation, and soil analysis report requirements of Article 22A.[107] The following is a summary of the results of this assessment, supplemented by information by earlier site assessments for the Golden Gateway Center, which encompasses part of the project site.[108]

Site and Vicinity History

The project area was submerged until the 1800s and filling of the area began in the mid-1850s. Filling continued intermittently until the late 1880s and included construction of two seawalls to protect the coastline and contain the fill in the reclaimed areas. The Old Seawall was constructed between 1867 and 1869 and the New Seawall was constructed between 1878 and 1889 using rock from Telegraph Hill.[109] Fill from the 1906 earthquake may also be present beneath the project site.[110]

Past uses of the site that could have affected soil and groundwater quality include the R.C. Chandlers Coal Yard and a coppersmith, which occupied the part of the project site just north of Washington Street, and the Dunsmuir Coal Yards that occupied the part of the project site north of Jackson Street.[111] [112] The surrounding area included similar uses. These establishments were in operation from approximately 1887 to 1906 when the earthquake and fire destroyed all of the buildings on the property.[113] The historic use of the site as coal yards and a coppersmith shop could have resulted in high levels of polynuclear aromatic hydrocarbons (PAHs) and metals in the soil and groundwater at the project site.

By 1913, the site had been entirely redeveloped. In 1948 through approximately 1965, there were various industries at the project site that would have used hazardous materials, including a sheet metal workshop, machine shops, metal products assembly areas, and an automobile repair shop. By 1965, most of these buildings were being demolished. From 1955 through approximately 1993, there was a gasoline service station located at 255 Embarcadero, the current location of

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[107] Treadwell & Rollo, *Phase I and Limited Phase II Environmental Site Assessment, 8 Washington Street (370 Drumm Street), San Francisco, California,* February 13, 2006.

[108] Dames & Moore, *Phase II Environmental Assessment Status Report, Golden Gateway Center, 460 Davis Court, San Francisco, California,* December 19, 1991 and Dames & Moore, *Report, Phase I Environmental Site Assessment Update, 460 Davis Court, San Francisco, California for Golden Gateway Center,* August 25, 1994. Seawall Lot 351 was not included in the Dames & Moore studies, though it was discussed as part of the consideration of uses in the Golden Gateway Center vicinity.

[109] Archeo-Tec, *Archaeological Research Design/Treatment Plan for the 8 Washington Street Project, City and County of San Francisco, CA,* January 17, 2003, pp. 28-29, 38, 41, and 45.

[110] Treadwell & Rollo, *Phase I and Limited Phase II Environmental Site Assessment*, p. 3.

[111] Treadwell & Rollo, *Phase I and Limited Phase II Environmental Site Assessment*, pp. 4-6.

[112] Archeo-Tec, *Archaeological Research Design/Treatment Plan for the 8 Washington Street Project,* p. 50.

[113] Archeo-Tec, *Archaeological Research Design/Treatment Plan for the 8 Washington Street Project,* p. 53.

Seawall Lot 351. These uses are typically associated with the use of petroleum products such as gasoline and diesel as well as solvents and metals.

The 1982 aerial photograph shows the current configuration of the Golden Gateway Tennis and Swim Club. By 1993, the current parking lot had been constructed over the former location of the gasoline service station and the viaduct over The Embarcadero had been removed.

Environmental Cases and Permitted Hazardous Materials Uses at the Site and in the Vicinity

The Phase I and Limited Phase II Environmental Site Assessment conducted for the project site included a review of environmental databases to identify permitted hazardous materials uses[114] and environmental cases[115] at the site and in the vicinity. On the basis of this review, Seawall Lot 351 is listed in the leaking underground storage tank (LUST) and Cortese regulatory databases because a release of petroleum hydrocarbons was reported in 1998 when three 6,000-gallon gasoline underground storage tanks (USTs) and a 500-gallon waste oil UST were removed.[116] Agency file reviews indicate that when the service station previously located on this portion of the site was demolished in 1998, contractors excavated contaminated soil and installed groundwater monitoring wells. The SFDPH granted regulatory case closure to the site in 2004. Groundwater sampling conducted prior to site closure showed concentrations of total petroleum hydrocarbons as gasoline and methyl tert-butyl ether (a gasoline additive) up to 250 micrograms per liter (ug/L) and 200 ug/L, respectively. The remainder of the project site was not identified in any of the environmental databases reviewed for the Phase I and Limited Phase II Environmental Site Assessment.

Three USTs on the Golden Gateway Center were removed in 1992: two 6,000-gallon diesel USTs and one 10,000-gallon gasoline UST.[117] No groundwater was encountered during removal of the 6,000-gallon USTs, located to the west of the proposed project site, and only low levels of toluene and xylenes were detected in soil samples from one of the UST excavations.

When the 10,000-gallon UST located east of Drumm Street within the boundaries of the proposed project site was removed, soil samples from the excavation contained 45 milligrams per kilogram (mg/kg) of total petroleum hydrocarbons as gasoline, 0.073 mg/kg of ethylbenzene, and 24 mg/kg of lead. Groundwater from the excavation contained 1.2 milligrams per liter (mg/L) of total petroleum hydrocarbons as gasoline, 0.019 mg/L of benzene, 0.0075 mg/L of toluene, 0.0033 mg/L of ethyl benzene, and 0.0051 mg/L of xylenes; lead was not detected in the groundwater sample. It was not determined whether the presence of these compounds was due to a release from the UST or other sources. The SFDPH required no further action regarding any of the UST removals at the Golden Gate Center and provided the property owners with a Certificate of UST Closure on December 11, 1992.

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[114] Permitted hazardous materials uses are facilities that use hazardous materials or handle hazardous wastes but comply with current hazardous materials and hazardous waste regulations.

[115] Environmental cases are sites suspected of releasing hazardous substances or that have had cause for hazardous materials investigations and are identified on regulatory agency lists. These are sites where soil and/or groundwater contamination is known or suspected to have occurred.

[116] Treadwell & Rollo, *Phase I and Limited Phase II Environmental Site Assessment*, pp. 7-8.

[117] Dames & Moore, *Report, Phase I Environmental Site Assessment Update*, pp. 6-8.

The Pacific Gas & Electric (PG&E) main transformers for the Golden Gateway Center property are located under Davis Court and Drumm Street sidewalks; none are located on the project site. The original transformers containing polychlorinated biphenyls (PCBs) were removed in August 1985 and replaced with silicone-filled transformers.[118] At the time of replacement of the PCB-containing transformers, no sign of leakage was reported.

Although the environmental database review conducted for the Phase I and Limited Phase II Environmental Site Assessment identified seven permitted hazardous materials uses and environmental cases within approximately 1,100 feet of the project site, these are all either small-quantity generators of hazardous waste, permitted UST sites with no documented releases, LUST sites that have received regulatory closure, or LUST sites with a low potential to affect soil or groundwater quality at the project site.[119]

Site Groundwater Quality

As discussed above, groundwater from the 10,000-gallon UST excavation in 1992 contained 1.2 mg/L of total petroleum hydrocarbons as gasoline, 0.019 mg/L of benzene, 0.0075 mg/L of toluene, 0.0033 mg/L of ethyl benzene, and 0.0051 mg/L of xylenes. Groundwater in the vicinity of the former gasoline station at Seawall Lot 351 contained total petroleum hydrocarbons as gasoline and methyl tert-butyl ether at concentrations up to 250 ug/L and 200 ug/L, respectively, at the time that the SFDPH granted regulatory case closure in 2004. In addition, grab groundwater samples taken in 1991 contained arsenic, barium, cadmium, chromium, lead, and mercury, as well as total petroleum hydrocarbons as diesel and total petroleum hydrocarbons as gasoline.[120] Benzene, toluene, ethylbenzene, and xylenes were not detected in the groundwater samples in 1991. These analytical results are representative of historic conditions, and it is likely that the concentration of petroleum hydrocarbons in the groundwater have declined over time. However, these results do indicate the potential for petroleum products and metals to be present in the groundwater.

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[118] Dames & Moore, *Report, Phase I Environmental Site Assessment Update,* p. 12.

[119] Treadwell & Rollo, *Phase I and Limited Phase II Environmental Site Assessment*, pp. 8-11.

[120] Dames & Moore, *Phase II Environmental Assessment Status Report,* Table 3.

Site Soil Quality

The Phase I and Limited Phase II Environmental Site Assessment included eight soil borings: two along Washington Street, two along The Embarcadero, three along the pedestrian pathway that forms the site's west boundary, and one within the site's interior (near the western edge of Seawall Lot 351). In addition, the 1991 investigation included two borings along the western project boundary.

To determine impacts related to the exposure to hazardous materials in the soil and groundwater, results from the sampling were compared to the RWQCB's environmental screening levels (ESLs) for residential and industrial uses.[121] [122] To analyze soil disposal requirements, the concentrations were compared to federal and State of California hazardous waste classification criteria. The results of the analysis are discussed below.

Potential Exposure to Hazardous Materials in Soil and Groundwater During Construction. Table 1 on p. 102 compares the maximum concentration of each constituent in the soil samples to the ESLs. With the exception of cyanide (which exceeded ESLs in all three soil samples analyzed for this constituent), these contaminants are not widespread.

Based on these results, workers and the public could be exposed to hazardous materials in the soil and groundwater during construction, potentially resulting in adverse health effects. However, the site mitigation plan prepared in accordance with Article 22A of the San Francisco Health Code would assess potential environmental and health and safety risks during construction and recommend measures to control these risks. Criteria for on-site reuse of soil would also be included. With implementation of this legally required plan, impacts related to exposure to hazardous materials in the soil during construction would be less than significant.

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[121] Residential environmental screening levels are a conservative estimate of safe levels of a chemical that a resident could be exposed to in the soil. Industrial screening levels are conservative estimates of safe levels of a chemical that a worker could be exposed to in soil resulting from occupational exposure, and are typically more conservative than those for construction workers or maintenance workers who would have less exposure to the chemicals in the soil.

[122] California Regional Water Quality Control Board, San Francisco Bay Region, *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater,* Interim Final, February 2005.

Table 1: Maximum Concentration of Chemicals in Project Site Soils that Exceed ESLs

		Screening Level	
Constituent	**Maximum Concentration (mg/kg)**	**Residential (mg/kg)**	**Industrial (mg/kg)**
Total Recoverable Petroleum Hydrocarbons	3,000	500	1,000
Total Petroleum Hydrocarbons as Diesel	150	100	100
Benzo (a) pyrene	0.23	0.038	0.13
Cyanide	0.16	0.0036	0.0036
Arsenic	6.3	5.5	5.5
Chromium	93	58	58
Cobalt	28	10	10
Lead	980	150	750
Zinc	640	600	600

Note: ESL = environmental screening level; mg/kg = milligrams per kilogram

Potential for Flammable Gases During Construction. Based on the historic presence of hydrocarbons in the soil and groundwater and the potential for methane in filled areas, flammable vapors could be present that could pose a fire or explosion risk to workers and the public during construction if ignited. The site assessment prepared for the project did not assess the potential for flammable vapors. Therefore, potential impacts related to the exposure to flammable vapors during construction are considered potentially significant. The sponsor has agreed to incorporate Mitigation Measure Hazards-1 (p. 115) into the project, requiring implementation of a soil vapor survey prior to final design of the proposed building, incorporation of the results into the site safety plan for construction, and implementation of measures to control flammable vapors during construction. With this measure, potential impacts related to exposure to flammable vapors would be less than significant.

Potential Exposure to Hazardous Materials in Soil and Groundwater During Operation. Because of the depth of excavation on the site, much of the contaminated soil would be removed and residents and visitors would not contact contaminated soil. Furthermore, clean fill material would be used in all landscaped areas. Therefore, residential exposure to hazardous materials left in the soil would not be of concern. However, during common maintenance activities such as repair of utilities, site maintenance workers could come into contact with hazardous materials left in place in the soil or groundwater.

The site mitigation plan prepared in accordance with Article 22A of the San Francisco Health Code would recommend cleanup levels and mitigation measures for exposure to hazardous materials in the soil and groundwater, if any are necessary, that would protect site maintenance workers. These recommended measures would be completed during construction and upon completion of construction, a certification report would be prepared as described under "Potential Impacts Related to Hazardous Materials in Soil or Groundwater," above. If the approved site mitigation plan for the project includes leaving hazardous materials in soil with measures to prevent exposure to hazardous materials, the SFDPH would require a risk management plan, health and safety plan, and possibly a cap maintenance plan as described above. With implementation of these legal requirements, impacts related to potential exposure to hazardous materials in the soil after construction of the project would be less than significant.

Although the walls of the underground structure would be waterproofed and would likely act as a barrier to vapor intrusion, vapors, if present, could accumulate in the subsurface parking structure causing nuisance vapors, adverse health effects, or flammable or explosive conditions. Because the presence of soil vapors and flammable gases has not been evaluated, impacts related to vapor intrusion are considered potentially significant. The project sponsor has agreed to implement Mitigation Measure Hazards-2 (p. 115), requiring a screening evaluation, site-specific evaluation, and implementation of engineering measures to control vapor intrusion in accordance with guidance developed by the California Department of Toxic Substances Control,[123] if needed on the basis of the soil vapor survey conducted in accordance with Measure Hazards-1.[124]

In accordance with the California Department of Toxic Substances Control guidance, the screening evaluation would estimate worst-case risks to building occupants from vapor intrusion using site-specific data and conservative assumptions specified in the guidance. If a substantial risk were indicated by this conservative analysis, additional site data would be collected and a site-specific vapor intrusion evaluation would be required. Should the site-specific evaluation identify substantial risks, additional measures would be required to reduce the risks to acceptable levels. These measures could include remediation of site soil and/or groundwater to remove vapor sources, or, should this be infeasible, use of engineering controls such as a passive or active vent system and a membrane system to control vapor intrusion. Where engineering controls are used, a deed restriction would be required, and would include a description of the potential cause of vapors, a prohibition against construction without removal or treatment of contamination to approved risk-based levels, monitoring of the engineering controls to prevent vapor intrusion until risk-based cleanup levels have been met, and notification requirements to utility workers or contractors who may have contact with contaminated soil and groundwater while installing utilities or undertaking construction activities. The screening level and site-specific evaluations would be conducted under the oversight of the SFDPH and methods for compliance with Measure Hazards-2 would be specified in the site mitigation plan prepared in accordance with Article 22A of the San Francisco Health Code and would be subject to review and approval by the SFDPH.

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[123] California Department of Toxic Substances Control, *Interim Final, Guidance for Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air.* December 15, 2004, revised February 7, 2005.

[124] If methane is present based on the soil vapor survey conducted in accordance with Measure Hazards-1, then the assessment of vapors would also incorporate guidance from the California Department of Toxic Substances Control *Advisory on Methane Assessment and Common Remedies at School Sites* dated June 16, 2005, as appropriate.

Soil Disposal Requirements and Groundwater Discharge

California Code of Regulations, Title 22, Sections 66260 through 66261.10 would require that the excavated soil be classified as a hazardous waste if it exhibits ignitability, corrosivity, reactivity, or toxicity. A waste is considered toxic if the total concentration of certain substances exceeds the total threshold limit concentration (TTLC), if the soluble concentration of certain substances exceeds the federal regulatory level, or the soluble threshold limit concentration (STLC), if it contains specified carcinogenic substances at a single or combined concentration of 0.001 percent, or if it exceeds toxicity testing criteria.

The Phase I and Limited Phase II Environmental Site Assessment found soluble lead concentrations that ranged from not detected to 160 mg/L. The concentration in 7 of the 19 samples analyzed exceeded the STLC of 5.0 mg/L; therefore, some of the fill materials could require disposal as a California hazardous waste. None of the samples exceeded the federal regulatory level of 5.0 mg/L, therefore, the excavated fill materials would not be characterized as a federal hazardous waste. None of the other metals concentrations exceeded California hazardous waste criteria. The site mitigation plan prepared in accordance with Article 22A of the San Francisco Health Code would identify appropriate waste disposal and handling requirements. With compliance with waste handling and disposal regulations, impacts related to disposal of hazardous wastes would be less than significant.

As discussed above, petroleum products and metals have previously been detected in the site groundwater. Based on these historic data as well as the site history and soil sampling described above, groundwater from construction dewatering could contain contaminants. Article 4.1 of the San Francisco Public Works Code, as supplemented by Order No. 158170, specifies conditions and criteria for discharge of groundwater (see Section E.14 for further discussion of Article 4.1 and Order No. 158170). Therefore, groundwater would be treated on site as necessary to meet discharge criteria. With compliance with legal requirements, impacts related to the discharge of groundwater during construction dewatering would be less than significant. As discussed in Section E. 13, Geology and Soils, long-term dewatering would not be required.

Conclusions

The results presented above indicate the presence of hazardous materials in the soil and groundwater under the project site. However, with implementation of the requirements of Article 22A for soil management and Article 4.1 of the Public Works Code and Order No. 158170 for the management of groundwater during construction dewatering, impacts related to the exposure to hazardous materials in the soil and groundwater during construction and project operation would be less than significant. Potentially significant impacts related to the potential presence of flammable or explosive vapors during construction and operation would be reduced to less than significant with implementation of Measures Hazards -1 and Hazards -2. This topic will not be analyzed in the EIR.

Potential Impacts Related to Hazardous Building Materials

The proposed project would involve demolition and removal of the tennis courts, pools, buildings, and pavement on the project site. Given the age of the existing structures (which were built around 1968), lead-based paint, asbestos-containing materials, PCBs, and other hazardous building materials may be present.

Lead-Based Paint. The proposed demolition must comply with Chapter 34, Section 3407 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove more than 100 total square feet of lead-based paint on the exterior of any building built prior to December 31, 1978, Chapter 34, Section 3407 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Section 3407 applies to the exterior of all buildings or steel structures on which original construction was completed before 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interiors of residential buildings, hotels, and childcare centers. The code contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the code shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work. Cleanup standards require the removal of visible debris, including the use of a High Efficiency Particulate Air Filter (HEPA) vacuum following interior work.

Chapter 34, Section 3407 also includes notification requirements and requirements for signs. Prior to commencement of work, the responsible party must provide written notice to the Director of the DBI of the address and location of the project; the scope of work including specific location; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property, the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. The code contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance. Compliance with these regulations and procedures required by the San Francisco Building Code would ensure that potential impacts related to the demolition of structures with lead-based paint are less than significant. This topic will not be analyzed in the EIR.

Asbestos. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified 10 days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, BAAQMD will inspect any removal operation for which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in Title 8, Sections 341.6 through 341.14, and Section 1529 of the California Code of Regulations where there is asbestos-related work involving 100 sq. ft. or more of asbestos-containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest that details the hauling of the material from the site and its disposal. Pursuant to California law, DBI would not issue the required permit until the applicant has complied with the notice requirements described above. With compliance with these regulations and procedures, already established as a part of the permit review process, impacts related to demolition of structures that include asbestos containing materials would be less than significant. This topic will not be analyzed in the EIR.

PCBs and Other Building Materials. Existing electrical transformers and equipment or fluorescent light ballasts manufactured before 1979 may contain PCBs, and fluorescent light ballasts manufactured between 1979 and the early 1990s may include di (2 ethylhexyl) phthalate (DEHP) that was used as a dielectric fluid during this time. Spent fluorescent light tubes commonly contain mercury vapors at levels high enough to be considered a hazardous waste under California law; depending on the levels of mercury present, the light tubes may also be classified as hazardous under federal law. These and other potentially hazardous building materials could pose a health risk for site workers if improperly handled. However, adherence to applicable laws and regulations for removal and disposal of these materials would reduce the potential for exposure to hazardous substances during demolition and renovation activities. Therefore, this impact would be less than significant, and this topic will not be analyzed in the EIR.

Question 15c: There are no schools within one-quarter mile of the project site.[125] Therefore, there is no impact related to the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. This topic will not be analyzed in the EIR.

Question 15d: As discussed in the response to Question 15b, Seawall Lot 351 is included on the State of California registered LUST and Cortese regulatory databases. In addition, soil and groundwater sampling has identified contaminants in the soil and groundwater at the site. Implementation of the requirements of Article 22A of the San Francisco Health Code would include site mitigation and risk management measures to address soil handling, health and safety requirements, and protection of workers and the public during and after construction. Therefore, impacts related to potential hazards to the public and environment due to hazardous materials in soil and groundwater at the project site would be less than significant. This topic will not be analyzed in the EIR.

Questions 15e–15f: The closest airports to the project site are San Francisco International Airport and Oakland International Airport, both of which are located more than 10 miles away. The project site is not located within an airport land use plan, within two miles of a public airport, or within the vicinity of a private airstrip. Therefore, this topic is not applicable to the proposed project and will not be analyzed in the EIR.

Question 15g: The proposed project would not change the existing traffic circulation network in the vicinity. Occupants of the proposed building and users of the athletic club facilities would contribute to congestion if an emergency evacuation of the project area were required. However, the proposed project would be required to comply with the current Building Code fire safety and fire prevention standards. Because the proposed project would conform to these standards, impacts related to interference with emergency response or evacuation plans would be less than significant and this topic will not be analyzed in the EIR.

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[125] San Francisco Unified School District Interactive Map, http://portal.sfusd.edu/template/default.cfm, accessed July 24, 2006; also based on a computer search of city maps.

Question 15h: San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. The proposed project would be required to conform to those provisions, which include additional life-safety protections for high-rise buildings (over 75 feet tall), and would be reviewed by the San Francisco Fire Department and Department of Building Inspection in order to ensure conformance with these provisions. Therefore, impacts related to fire hazards would be less than significant and this topic will not be analyzed in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
16. MINERAL AND ENERGY RESOURCES—Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

Questions 16a–b: All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the CDMG under the Surface Mining and Reclamation Act of 1975 (CDMG, Open File Report 96-03 and Special Report 146 Parts I and II). This designation indicates that there is inadequate information available for assignment to any other MRZ and thus the site is not a designated area of significant mineral deposits. Since the project site is already developed, future evaluation or designation of the site would not affect or be affected by the proposed project. There are no operational mineral resource recovery sites in the project area whose operations or accessibility would be affected by the construction or operation of the proposed project.

Question 16c: The project would involve the construction of multi-family residential buildings with retail uses and a health club, underground parking for residents and the public, and outdoor recreational uses. Some of the proposed uses would replace existing uses on and adjacent to the project site, but there would still be an increased intensity of use with the project. The increase in residential population and employment and site visitors would result in an increase in energy use. However, the increase in site population and employment would be small in the context of overall population and employment in San Francisco. In addition, the project sponsor intends to comply with LEED requirements and obtain LEED credits for energy conservation.[126] The project would incorporate EnergyStar appliances, heat exchangers and heat pumps, and solar energy where feasible (such as on top of elevator penthouses and on the tennis club buildings), among other features, and the project would include a green roof that would help to reduce heat island effects and corresponding energy demands. For those reasons, the project would not result in the use of large amounts of fuel, water, or energy.

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the applicable for the building permit. Title 24 is enforced by the Department of Building Inspection. Because the proposed project would meet current State and local codes concerning energy consumption, the project would not result in a wasteful use of energy. No significant impacts would occur, and therefore energy use will not be analyzed in the EIR.

The project would use energy produced in regional power plants using hydropower and natural gas, coal, and nuclear fuels. The project would not use substantial quantities of other non-renewable natural resources. Therefore, the project would not have a substantial effect on the use, extraction, or depletion of a natural resource. This topic will not be evaluated in the EIR.

The following discussion addresses potential impacts related to electricity and natural gas services.

Electricity

San Francisco uses about 5,000 gigawatt-hours (GWh) of electricity per year and reaches a peak demand of about 900 megawatts (MW) in a given year. According to the SFPUC's Electricity Resource Plan from 2002, more than 60 percent of this demand is used for commercial purposes and residential use accounts for 27 percent. The SFPUC expects an approximate 20 percent increase in peak electricity demand in San Francisco between the years of 2002 and 2012.[127]

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[126] LEED prerequisites for Energy & Atmosphere include fundamental building commissioning of building energy systems, minimum energy performance levels, and zero use of CFC-based refrigerants in new building HVAC systems. Credits can be obtained through optimized energy performance, use of on-site renewable energy (which is not proposed for this project), enhanced commissioning and refrigerant management, measurement and verification of building energy consumption, and the use of renewable energy contracts. From LEED-NC Version 2.2, U.S. Green Building Council, https://www.usgbc.org/ShowFile.aspx?DocumentID=1095, accessed July 12, 2007.

Electricity is supplied to San Francisco mainly through power generated elsewhere and carried to the City via PG&E transmission lines; and the Potrero power plant, a fossil fuel plant operated by the Mirant Corporation that has a capacity of 362 MW (enough to serve about 362,000 homes).[128] [129] The City is also promoting and undertaking electricity production through "distributed generation," which involves many smaller power-generating facilities, as opposed to traditional centralized plants. Finally, the City is actively promoting energy conservation through such projects as improving efficiency in public buildings and encouraging businesses and residents to conserve through programs operated by the Department of the Environment and the SFPUC.[130]

The City hopes to facilitate closure of the Potrero plant, in part through construction of a 145-MW plant powered by three gas-fired combustion turbines just south of the existing Potrero plant, and a 49-MW plant powered by one gas turbine at San Francisco International Airport. The California Energy Commission approved development of the facility near the Potrero plant in October 2006, and commercial operation of the new plant is expected to begin in late 2007.[131] The new plants and other projects are part of what is known as the "ISO Revised Action Plan for San Francisco," intended to provide for a reliable San Francisco power supply.[132] Another project that will help to improve reliability and meet future demand is a transbay power line that will run beneath Suisun, San Pablo, and San Francisco Bays, from Pittsburg to San Francisco. This project was approved by the City of Pittsburg in November 2006 and is scheduled to be operational by 2009.[133]

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[127] San Francisco Public Utilities Commission and San Francisco Department of Environment, "The Electricity Resource Plan," Revised December 2002, http://www.sfenvironment.com/index.htm (Energy Issues/ Electricity Resource Plan), accessed January 12, 2007.

[128] "PG&E Completes Jefferson-Martin 230-Kv Transmission Line in San Mateo County; Will Close Hunters Point Power Plant in May," April 28, 2006, http://www.pge.com/news/archived_news_releases/q2_2006/index.html, accessed January 12, 2007; Mirant Corporation, http://www.mirant.com/our_business/where_we_work/potrero.htm, accessed January 12, 2007.

[129] The Hunters Point fossil fuel plant ceased operations on May 15, 2006. The California Independent System Operator terminated the "reliability must-run" contract for the plant after PG&E completed nine transmission line projects to replace and enhance power reliability. See "PG&E, Community Celebrate Closure of Hunters Point Power Plant," news release, May 23, 2006, http://www.pge.com/news/archived_news_releases/q2_2006/index.html, accessed January 12, 2007.

[130] San Francisco Public Utilities Commission and San Francisco Department of Environment, "The Electricity Resource Plan," Revised December 2002, found through http://www.sfenvironment.com/index.htm (Energy Issues/ Electricity Resource Plan), accessed January 12, 2007.

[131] California Energy Commission, Docket #04 AFC-1, available on the CEC website at; http://www.energy.ca.gov/sitingcases/sanfrancisco/index.html, accessed January 12, 2007.

[132] The Action plan was first approved in November 2004 and is currently being implemented. See DeShazo, Gary and Julie Gill, California ISO, "Update on Action Plan for San Francisco," memorandum to ISO Operations Committee, June 8, 2005, http://www.caiso.com/docs/09003a6080/36/1d/09003a6080361d9c.pdf, accessed January 12, 2007.

With continuing progress in improving the distribution network to bring power to San Francisco, future electrical demand in the City would become more an issue of statewide generating capacity, combined with State and local efforts to reduce consumption. In light of the State and local efforts under way, the incremental increase in demand for electricity in San Francisco from the proposed project would not be significant. This topic will not be analyzed in the EIR.

Natural Gas

Consumption of natural gas in California averaged more than 6.2 million cubic feet per day in 2004. Electrical generation (use in power plants) consumed about half of the total; residential use (mostly for space and water heating) totaled about 22 percent. California imports about 85 percent of its natural gas supply.[134] Future natural gas supply and demand are of concern statewide because of the increased reliance on imported sources and rising natural gas prices.[135]

The California Energy Commission's 2005 Integrated Energy Policy Report notes that the State has increased funding for natural gas efficiency programs and has set goals to increase gas savings substantially. State law requires that gas utilities meet their unmet resource needs through efficiency and demand reduction measures first. In addition, the California Energy Commission also conducts natural gas research and development activities. The State also has increased its natural gas storage inventory and expanded gas pipeline capacity.[136] In the context of these actions and ongoing statewide planning efforts, the incremental increase in natural gas consumption resulting from the proposed project would be less than significant. This topic will not be analyzed in the EIR.

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[133] Information about the cable and the EIR on the project can be found on the City of Pittsburg website, http://www.ci.pittsburg.ca.us/pittsburg/ (City News/Trans Bay Cable Project). The Notice of Determination recording project approval can be found at http://www.ceqanet.ca.gov/ (Clearinghouse #2004082096), accessed January 12, 2007.

[134] California Energy Commission, "California Natural Gas Facts and Figures," http://www.energy.ca.gov/naturalgas/natural_gas_facts.html, accessed January 12, 2007.

[135] California Energy Commission, Natural Gas Assessment Update, staff report, February 2005, from http://www.energy.ca.gov/naturalgas/index.html (Documents and Reports), accessed January 12, 2007.

[136] California Energy Commission, 2005 Integrated Energy Policy Report, Executive Summary, November 2005, available on the CEC website at http://www.energy.ca.gov/2005_energypolicy/index.html, accessed May 26, 2006.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
17. **AGRICULTURE RESOURCES** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. **Would the project:**					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance, to non-agricultural use?	☐	☐	☐	☐	☒

Questions 17a–17c: The project site is developed and is in an urban area that does not include any agricultural uses or agricultural zoning. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site as "Urban and Built-up Land."[137] Because the site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, unique farmland, or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with existing zoning for agricultural land use or a Williamson Act contract, nor would it involve any changes to the environment that could result in the conversion of farmland.

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[137] California Department of Conservation, Farmland Mapping and Monitoring Program, 2002.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
18. MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐	☐
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐	☐
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	☐

Question 18a: The project could result in significant impacts with respect to visual quality, cultural resources, transportation, air quality, and shadow. These topics will be addressed in the EIR. As noted elsewhere in this Initial Study, the project could result in significant impacts with respect to construction noise, construction air quality, biological resources (due to the potential presence of active nests), and hazards (due to the potential presence of flammable vapors and methane). However, these potential impacts would be reduced to less-than-significant levels with mitigation incorporated into the proposed project.

Question 18b: The project could have cumulative impacts, primarily with respect to increased traffic congestion. These impacts will be addressed in the EIR.

Question 18c: Potential adverse effects on human beings have been considered as part of the analysis of individual environmental topics in this Initial Study. Potential impacts to humans with respect to visual quality, transportation, air quality, and shadow will be addressed in the EIR. As noted elsewhere in this Initial Study, the project could result in significant impacts with respect to construction noise, construction air quality, and hazards (due to the potential presence of flammable vapors and methane). However, these potential impacts would be reduced to less-than-significant levels with mitigation incorporated into the proposed project. The project would not have any other environmental effects that would cause substantial adverse effects on humans.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

Mitigation measures and improvement measures identified in the discussion for the applicable topic areas are summarized below.

Mitigation Measure Noise-1: Construction Noise: Pile driving would be required for this project. The project sponsor shall require construction contractors to pre-drill site holes to the maximum depth feasible based on soil conditions. The project sponsor shall also require that contractors schedule pile-driving activity for times of the day that would be in accordance with the provisions of the San Francisco Noise Ordinance and in consultation with the Director of Public Works, to disturb the fewest people. Contractors shall be required to use construction equipment with state-of-the-art noise shielding and muffling devices. At least 48 hours prior to pile-driving activities, the project sponsor shall notify building owners and occupants within 200 feet of the project site by fliers posted on each floor in each building and distributed by building management of the dates, hours, and expected duration of such activities.

Mitigation Measure Noise-2: Title 24 Compliance: The project sponsor shall conduct a detailed analysis of noise reduction requirements for the proposed buildings. Noise insulation features identified and recommended by the analysis shall be included in the building design, as specified in the *San Francisco General Plan* Land Use Compatibility Guidelines for Community Noise to reduce potential interior noise levels to the maximum extent feasible.

Mitigation Measure AQ-1: Construction Air Quality: The project sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose. The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and implementation of specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

The project sponsor shall require the construction contractor(s) to implement one or more additional measures to reduce construction exhaust emissions of PM_{10}. These measures include (but are not limited to) the use of late-model or retrofitted equipment; the use of $PuriNO_x$ or other fuel additives; the use of ultra-low-sulfur fuel; and/or the use of PM_{10} particulate traps.

Mitigation Measure Bio-1: Protection of Birds During Tree Removal: The project sponsor would implement the following protective measures to assure implementation of the Migratory Bird Treaty Act and compliance with State regulations during tree removal.

Pre-construction surveys for nesting birds shall be conducted by a qualified ornithologist or wildlife biologist to ensure that no nests will be disturbed during project implementation. A pre-construction survey shall be conducted no more than 14 days prior to the initiation of demolition/construction activities during the early part of the breeding season (January through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August). During this survey, the qualified person shall inspect all trees in and immediately adjacent to the proposed construction area for nests. If an active nest is found close enough to the construction area to be disturbed by these activities, the ornithologist, in consultation with CDFG, shall determine the extent of a construction-free buffer zone to be established around the nest.

Mitigation Measure Hazards-1: Flammable Vapors During Construction: The project sponsor shall implement a soil vapor survey to evaluate the presence of potentially flammable vapors prior to final design of the proposed building. Should the survey identify the potential presence of flammable vapors at levels greater than the lower flammability limit or lower explosive limit, then the project sponsor shall require the construction contractor to include measures to control flammable gases during construction (such as ventilation) in the construction site safety plan and to implement these measures.

Mitigation Measure Hazards–2: Vapor Intrusion During Operation: Based on the results of the soil vapor survey conducted in accordance with Mitigation Measure Hazards-1, the project sponsor shall perform a screening evaluation to assess the worst-case risks related to vapor intrusion into the subsurface structure following construction. Should the screening evaluation indicate substantial risk, then the project sponsor shall conduct additional site characterization as necessary and conduct a site-specific evaluation, including fate and transport modeling, to more accurately evaluate site risks. Should the site-specific evaluation indicate substantial risk, the project sponsor shall implement either soil and/or groundwater remediation to remove vapor sources or engineering measures such as a passive or active vent system and a membrane system to control intrusion of vapors into the proposed structure and conduct long-term monitoring for potential intrusion of vapors until risk-based cleanup levels have been met. The degree of monitoring would depend upon site specific conditions and the level of volatile organic compounds present. These actions shall be conducted in accordance with the California Department of Toxic Substances Control guidance, *Interim Final, Guidance for Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air* dated December 15, 2004, revised February 7, 2005 or the current version of this guidance at the time of construction. The screening level and site-specific evaluations shall be conducted under the oversight of the SFDPH and methods for compliance with this measure shall be specified in the site mitigation plan prepared in accordance with Article 22A of the San Francisco Health Code and subject to review and approval by the SFDPH.

G. ALTERNATIVES

As required by CEQA, alternatives to the proposed project intended to avoid or reduce one or more of the project's significant environmental effects will be analyzed in the EIR. Planning alternatives will be considered to address the public trust status and the separate ownership of the two sites. Based on the information available at this time, it is anticipated that the EIR will include discussion of the following alternatives and planning alternatives: (1) the No Project Alternative, as required by CEQA; (2) a reduced project alternative that includes reduced parking and density on the project site; (3) a planning alternative that assumes that the public trust is not removed from Seawall Lot 351; and (4) a planning alternative that assumes that Seawall Lot 351 and the 8 Washington site are developed independently. Alternatives to the proposed project will be defined further in the EIR.

H. DETERMINATION

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

William Wycko
Acting Environmental Review Officer
for
Dean L. Macris
Director of Planning

DATE December 4, 2007

Stanley Muraoka
Environmental Review Officer
San Francisco Redevelopment Agency

DATE December 4, 2007